

EXHIBIT 1

)	
Michael E. Wyatt)	
)	
Plaintiff,)	Case No. 7:14-cv-492-NKM-RSB
)	
v.)	
)	
Johnny Owens, <i>et al.</i> ,)	
)	
Defendants.)	

I, Gordon D. Todd, hereby declare as follows:

1. I am a partner at Sidley Austin LLP (“Sidley”) and counsel for Plaintiff Michael E. Wyatt in the above-captioned case. The information set forth in this Declaration is based on my first-hand knowledge, about which I could and would testify competently in open Court if called upon to do so, and on records contemporaneously generated and kept by Sidley in the ordinary course of its law practice. This Declaration is submitted in support of Plaintiff’s Motion for an Award of Attorneys’ Fees, Expenses, and Costs.

2. At the invitation of the Court, in February 2016, my Sidley colleagues and I assumed representation of Mr. Wyatt in his § 1983 excessive-force case against the Defendants, each of whom is an officer of the Pittsylvania County Sheriff's Office who was involved in Mr. Wyatt's arrest and beating on July 3, 2012. We agreed to take Mr. Wyatt's case without payment or a contingency agreement with Mr. Wyatt, and with an understanding that the law authorized us to seek attorneys' fees if Mr. Wyatt prevailed on the merits.

3. I have practiced civil litigation in Washington, D.C., since 2001, and am currently a partner at Sidley Austin LLP. My practice at Sidley focuses on complex civil litigation in federal and state court and before administrative agencies. Before joining Sidley, I held several posts in the U.S. Department of Justice, including Counsel to the Assistant Attorney General for Civil Rights, Special Counsel for Supreme Court Nominations, and Deputy Associate Attorney General. I graduated *cum laude* from Princeton University in 1995 and earned my law degree from the University of Virginia School of Law in 2000. I also served as a law clerk to judges on the U.S. Supreme Court and the U.S. Court of Appeals for the Eighth Circuit.

4. Sidley devoted tremendous time and resources to this case—in total, Sidley attorneys and support staff expended 3,645 hours on Mr. Wyatt’s case, which at standard billing rates would result in over \$2.2 million in legal fees. When Sidley accepted the representation, the case was entirely undeveloped. The complaint required substantial amendment, and discovery had not begun. In addition, Mr. Wyatt’s counsel fought, and overwhelmingly prevailed on, numerous difficult, highly fact-bound evidentiary disputes. This included 71.15 hours expended on three motions and related efforts—Plaintiff’s Motion to Compel, ECF No. 65; Defendants’ Motion to Quash, ECF No. 70; and Plaintiff’s Motion to Depose Michael Young, ECF No. 115—related to Defendants’ efforts to withhold discovery. At least some additional time was consumed when the case was extended by five months at the defendants’ request. Plaintiff’s counsel had begun preparing for the originally scheduled trial in November, which was continued based on the unavailability of a witness the defendants ultimately chose not to call at the rescheduled trial in April. Plaintiff’s counsel also was required to expend additional hours as a result of Defendants’ request to continue the trial to accommodate the schedule of a witness they elected ultimately not

to call. As a result of this case, Sidley attorneys spent substantial amounts of time that could have been devoted to other clients and matters.

5. Since the firm's appointment, several partners, associates, paralegals, and support staff have contributed to our efforts in this case. Nonetheless, this Motion seeks reimbursement for the time and expenses of just me, five associates (Benjamin Beaton, Cara Viglucci Lopez, Morgan Branch, Daniel Hay, and Robin Wright), and one paralegal (Erin Lyons). Brief biographies of me, Mr. Beaton, Ms. Branch, Ms. Wright, and Mr. Hay are attached hereto as **Exhibit 1-A**. I have reviewed these biographies and affirm that they are true and correct to the best knowledge, information, and belief. Ms. Viglucci Lopez, who left Sidley in January 2017 to assume the role of head of investigations for a telecommunications company, is a graduate of Princeton University (2001) and Harvard Law School (2008). Ms. Viglucci Lopez has extensive experiencing litigating complex and high-profile matters through trial in federal and state court. Ms. Lyons, a paralegal and a graduate of Hendrix College, has extensive experience assisting in litigation of the firm's complex criminal, Supreme Court, and pro bono matters.

6. Sidley normally charges for the services of its attorneys and support staff on the basis of hourly rates, which increased on January 1, 2017.¹ The standard billing rates for the individuals listed in ¶ 5 are as follows:

¹ Plaintiff's Motion for Fees, Costs, and Expenses does not seek to apply this fee increase. The higher rates reflect a standard market value of approximately \$90,000.

Name	Law School Year	2016 Rate	2017 Rate
G. Todd	2000	\$900	\$975
C. Viglucci Lopez	2008	\$780	n/a
B. Beaton	2009	\$780	\$810
R. Wright	2013	\$615	\$710
M. Branch	2015	\$450	\$560
D. Hay	2015	\$450	\$560
E. Lyons		\$245	\$250

7. Throughout this representation, Plaintiff's Counsel have kept daily time-records that reflect the amount of time spent on this matter each day, along with a description of the tasks performed. These records are entered into a computer database, checked, and maintained in computer-readable format. The attorneys and support staff identified in ¶ 5 expended the following hours in this case:

a. Mr. Todd: 431.1 hours. I was the lead trial attorney, responsible for overall case management and litigation strategy.

b. Mr. Beaton: 687.3 hours. Mr. Beaton was responsible for day-to-day case management; supervised the work of junior associates; coordinated expert witnesses; took or defended the deposition of eight witnesses and potential witnesses; examined or cross-examined four trial witnesses; and performed other tasks related to the successful representation of Mr. Wyatt.

c. Ms. Viglucci-Lopez: 180.5 hours. Ms. Viglucci Lopez took the deposition of two defendants, and was responsible for developing Plaintiff's damages case.

d. Ms. Branch: 766.1 hours. Ms. Branch coordinated review of Defendants' document productions; briefed and argued motions; took the deposition of five witnesses

and potential witnesses; examined or cross-examined three trial witnesses; and performed other tasks related to the successful representation of Mr. Wyatt.

e. Mr. Hay: 280.1 hours. Mr. Hay researched and drafted several motions, second chaired the deposition of Michael Young, helped draft several witness examination outlines, and performed other tasks related to the successful representation of Mr. Wyatt.

f. Ms. Wright: 115.1 hours. Mr. Wright researched and drafted several motions, drafted Plaintiff's proposed jury instructions, helped draft several witness examination outlines, and performed other tasks related to the successful representation of Mr. Wyatt.

g. Ms. Lyons: 440.1 hours. Ms. Lyons provided comprehensive paralegal support to the attorneys in this matter, including preparing exhibits, filing motions papers and pleadings, and coordinating with prison officials for attorneys visits and to transport Mr. Wyatt for trial.

Attached hereto as **Exhibit 1-B** are time records for this case detailing the hours and activities for which Mr. Wyatt is seeking compensation.

8. I have exercised billing judgment to reduce or eliminate the time that may be perceived to have been unnecessary, duplicative, inefficient, or could have been completed by a less experienced attorney. In addition, I made several categorical reductions to the requested hours. The hours listed above do not include hours expended by other Sidley attorneys and support staff who participated in this matter (408.75 hours); hours spent researching, briefing, or arguing Mr. Wyatt's motion to amend the complaint to add a supervisory liability claim against Pittsylvania County Sheriff Michael Taylor (118 hours); or non-working attorney travel time (66.5 hours). I also reduced the number of hours attributable to Ms. Viglucci Lopez. Ms. Viglucci Lopez

withdrew from the case before trial, and therefore I have eliminated hours she spent preparing for trial. The remaining hours are all hours Sidley would charge to a fees-paying client (as are many of the hours that I have removed from this fee request).

9. Sidley has also expended \$127,700.81 in expenses and costs in this matter, not including expert fees and costs. These expenses were necessarily incurred and are the type of out-of-pocket expenses normally billed to fee-paying clients. A detailed accounting of costs and expenses expended by Sidley and Sidley personnel is not yet available due to internal accounting procedures that remain in progress. Plaintiff's Counsel will submit a supplemental declaration as soon as possible describing in detail these costs and expenses.


10. Finally, Sidley also advanced \$22,945.86 to cover fees and expenses for Mr. Wyatt's trial experts: Dennis Waller and Dr. Jeffrey Smith. Mr. Waller was deposed in this case, testified at trial, consulted with plaintiff's counsel throughout the trial, and traveled between Danville and his home in Wisconsin. Mr. Waller traveled using regular coach airfare and stayed in a hotel in Danville during trial. Dr. Smith, who was not deposed, traveled to and from Danville by car on the date of his testimony. Mr. Waller incurred the following actual costs associated with attending trial:

- a. Airfare: \$628.06
- b. Rental Car: \$387.01
- c. Parking: \$42.50

Sidley advanced the cost of these expenses, an invoice for which is attached hereto as **Exhibit 1-C**.

I declare under penalty perjury that the foregoing and attached documents are true and correct to the best of my knowledge.

Executed in Washington, D.C., on May 18, 2017.



Gordon D. Todd

EXHIBIT 1-A



PARTNER

Gordon D. Todd

Commercial Litigation and Disputes

Supreme Court and Appellate

White Collar: Government Litigation & Investigations

GTODD@SIDLEY.COM

WASHINGTON, D.C. +1 202 736 8760

GORDON TODD, a trial lawyer, represents plaintiffs and defendants in criminal and civil litigation matters in federal, state and administrative courts. In addition, Gordon routinely represents clients in connection with government inquiries, internal investigations and other enforcement matters. Prior to joining Sidley, Gordon held several posts at the United States Department of Justice. Gordon is a former law clerk to Justice Samuel Alito and to Eighth Circuit Judge C. Arlen Beam.

REPRESENTATIVE MATTERS

Gordon's litigation experience includes:

- *Wyatt v. Owens* (W.D. Va.): Lead trial counsel representing plaintiff in civil rights action alleging use of unconstitutionally excessive force in effecting arrest. Following three-day jury trial, jury found Deputy liable and awarded compensatory and punitive damages.
- *Ford v. United States* (United States Court of International Trade). Represent Ford Motor Company in challenge to Customs and Border Protection's classification of Ford Transit Connect vehicles as vehicles principally designed for the transport of goods (dutiable at 25%) rather than vehicles principally designed for the transport of persons (dutiable at 2.5%);
- *Misappropriation of Trade Secrets*: Represented technology company in dispute over competitor's misappropriation of trade secrets. Following mediation, matter resolved through favorable settlement that fully protected client's intellectual property rights;
- *Raytheon Company v. BAE Systems* (Del. Chancery): Represent plaintiff in lawsuit alleging contract and tort claims arising out of the cancellation of a program to upgrade the avionics and radar systems on South Korea's fleet of F-16 fighter aircraft
- *Clear Channel v. City of Baltimore* (Md. Tax Court): Lead trial counsel for plaintiff in suit challenging

constitutionality of tax levied on privately owned, commercial, off-premises billboards.

- *In re Veg Liquidation, Inc.* (W.D. Ark. Bkty): Represent defendant professional services firm in a series of bankruptcy Adversary Proceedings involving claims under the Perishable Agricultural Commodities Act (PACA) as well as various common law claims;
- *Johnson ex rel. United States* (E.D. Cal.). Represented major retailer in False Claims Act qui tam lawsuit relating to the execution of a federal nutrition program. Suit dismissed following non-intervention by Government;
- *Willie McCormick & Sons, Inc. v. Lakeshore Engineering Services, Inc., et al.* (E.D. Mich.): Lead defense counsel in suit alleging civil RICO and antitrust conspiracies to rig the market for municipal services contracts. All claims against the client dismissed and dispute settled favorably pending appeal;
- *In re Tyson Farms* (USDA): Lead trial counsel defending against alleged breaches of the Packers & Stockyards Act in connection with payments made for the raising of poultry. Defense verdict following trial;
- *Scenic Jacksonville, Inc. v. Clear Channel Outdoor, Inc.* (Fla.): Represented defendant in action to enforce settlement agreement seeking to compel the removal of digital and static billboards in the City of Jacksonville. Matter resolved through favorable settlement and legislative change that confirmed the legality of all existing signs, allowed for the expansion of client's digital sign inventory, and provided for relocation of signs to more favorable locations;
- *Cook v. Howard Industries, Inc.* (S.D. Miss.): Represented defendant in class action suit alleging race discrimination in hiring. Matter resolved through a favorable class settlement;
- *Stark 1350, LLC v. City of Cleveland* (N.D. Ohio): Represented City defendant against Constitutional challenge to the legality of its outdoor advertising code. Matter resolved with a favorable settlement without change to the sign code;
- *United States ex rel. Lisitza* (D. Mass.): Represented defendant pharmaceutical corporation against allegations of payment of unlawful kickbacks and inducement of false claims for reimbursement to federal and state health care programs. Matter resolved through favorable settlement;
- *Macomb County Drain Drainage District v. Kilpatrick* (E.D. Mich.): Represented individual defendant on RICO, antitrust, fraud, and various other state law claims in a matter arising out of the criminal prosecution of former Detroit Mayor Kwame Kilpatrick. Summary judgment awarded on all counts in client's favor;
- *T.B. v. Pierson* (Ala.): Represented international credit card company in state court tort suit alleging facilitation of tortuous conduct arising out of the online marketing, through credit card payments, of salacious photographs of minor female plaintiff. Secured dismissal as a matter of law of original and amended complaints for failing to meet the requirements for imposing tort liability for the criminal conduct of a third party;
- *QVC, Inc. v. Your Vitamins, Inc.* (D. Del.): Represented defendants/counter-claimants in a Lanham Act and deceptive trade practices matter arising out of the televised marketing of vitamins and dietary supplements. Matter resolved through a favorable settlement;

- *Crawley v. Clear Channel Outdoor, Inc.* (M.D. Fla.): Represented defendant in putative state law class action arising out of the advertizing of tribal gambling in Florida. Lawsuit dismissed for failure to state a claim upon which relief could be granted;
- *State of Oklahoma v. Tyson Foods* (N.D. Okla.): Represented defendant in a five-month long bench trial on numerous federal and state environmental and tort claims. Successfully briefed and argued for the mid-trial dismissal of several claims and for the pre-trial exclusion of scientific expert causation witnesses;
- *United States v. Acevedo-Vila* (D.P.R.): Represented the former Governor of Puerto Rico in connection with campaign finance, public corruption, and tax charges. Fifteen counts dismissed prior to trial, and jury acquittal on all nine remaining counts; and
- *Davis v. East Baton Rouge Parish School District* (M.D. La.): With prior law firm, represented public school system in a successful effort to bring to a close a fifty-year old desegregation matter.

Gordon's experience in counseling and investigations includes:

- *Internal Investigations*: Work with in-house counsel to conduct internal investigations into criminal, civil, and corporate policy compliance-related issues, and consult with client as to necessary and appropriate internal and external steps and procedures; and
- *Government Investigations*: Represent corporate and individual clients in civil and criminal government investigations, including conducting internal investigations and negotiating with relevant investigatory or regulatory agencies. Experience includes investigations by or involving the United States Departments of Justice, Agriculture, and Housing and Urban Development, the Environmental Protection Agency (EPA), and financial regulatory agencies including the Federal Deposit Insurance Corporation (FDIC), the Consumer Finance Protection Bureau (CFPB), the Office of the Comptroller of the Currency (OCC), the Federal Reserve, and the United States Postal Service.

Prior to joining Sidley, Gordon held several posts at the United States Department of Justice:

- As **Deputy Associate Attorney General**, Gordon assisted the Associate Attorney General manage the Department's civil components. Gordon's portfolio included reviewing litigation conducted by the Tax and Civil Rights Divisions, as well as the operations of the Office of Justice Programs, the Office of Community Oriented Policing Services, and the Office on Violence Against Women. Gordon served on an interagency committee on False Claims Act enforcement, and also handled various special projects.
- As **Special Counsel for Supreme Court Nominations**, Gordon directed a team of lawyers supporting the nomination and confirmation process for Supreme Court justices.
- As **Counsel to the Assistant Attorney General for Civil Rights**, Gordon served as legal and policy advisor to the Assistant Attorney General heading the Civil Rights Division. Gordon's duties included overseeing litigation involving Fair Housing, Fair Lending, and Disability rights issues, coordinating with the Division's administrative component, and focusing on other special projects.

EVENTS

- *Faculty Member*, National Trial Advocacy Institute (NITA) trial advocacy program, Georgetown Law

Center (Annual)

- *Presentation*, Shifting Constitutional Sands for Out-of-Home Advertising, Outdoor Advertising Association of America Legal Seminar (November 2016)
- *Presentation*, Constitutionality of Location-Based and Commerce-Based Regulation of Outdoor Advertising Following *Reed v. Town of Gilbert*, Outdoor Advertising Association of America (October 2015)
- *Presentation*, First Amendment Issues in Outdoor Advertising, Outdoor Advertising Association of America Annual Legal Seminar (November 2014)
- *Faculty Member*, PLI 19th Annual Consumer Financial Services Institute (April 2014)
- *Presentation*, Confronting Targeted Billboard Taxes: First Amendment Challenges, Outdoor Advertising Association of America (December 2013)
- *Symposium Participant*, Disparate Impact: Ensuring Common-Sense Fair Lending Policies, United States Chamber of Commerce Center for Capital Markets Competitiveness & National Chamber Litigation Center (October 2013)
- *Participant*, SCOTUSblog Symposium on the Supreme Court's Role in the 2012 Presidential Election (2012)
- *Presentation*, Effective Oral Advocacy, University of Virginia School of Law Lile Moot Court Program (2009)
- *Keynote Speaker*, Justice Department Priorities & Initiatives, Kentucky Bar Association Annual Meeting, Lexington (2006)
- *Keynote Speaker*, National Advisory Committee on Violence Against Women Convening Meeting, Dallas (2006)
- *Panel Participant*, Addressing New Home Mortgage Disclosure Act Data, ACI National Corporate Counsel Conference, Washington (2005)
- *Panel Participant*, Racial Profiling in Federal Law Enforcement, Network of Indian Professionals Conference, Atlanta (2005)
- *Delegation Member*, United States Mission to the Organization for Security & Cooperation in Europe Summit on Racism & Xenophobia on the Internet (2004)

SERVICES

Antitrust and Unfair Competition

Antitrust Litigation

Business Torts

Commercial Litigation and Disputes

Consumer and Other Financial Services Litigation and Enforcement

Contract Litigation

Daubert Hearings/Junk Science

Employment Litigation

Environmental Torts and Public Nuisance Litigation

False Claims Act

Financial Institutions Litigation

Internal Investigations

Supreme Court and Appellate

Trade Secret and Unfair Competition Litigation

Trials

White Collar: Government Litigation & Investigations

INDUSTRIES

Media and Entertainment

ADMISSIONS & CERTIFICATIONS

U.S. Supreme Court
U.S. Court of International Trade
U.S. Court of Federal Claims
U.S. Court of Appeals, 6th Circuit
U.S. Court of Appeals, 8th Circuit
U.S. Court of Appeals, 10th Circuit

U.S. Court of Appeals, D.C. Circuit
U.S. District Court, District of Columbia
U.S. District Court, E.D. of Michigan
District of Columbia
Virginia

EDUCATION

University of Virginia School of Law, J.D., 2000 (Order of the Coif)
Princeton University, A.B., 1995 (*cum laude*)

CLERKSHIPS

Samuel A. Alito Jr, United States Supreme Court (2006 - 2007)
C Arlen Beam, U.S. Court of Appeals, 8th Circuit (2000 - 2001)

Attorney Advertising - Sidley Austin LLP, One South Dearborn, Chicago, IL 60603. + 1 312 853 7000. Sidley and Sidley Austin refer to Sidley Austin LLP and affiliated partnerships as explained at www.sidley.com/disclaimer. Prior results do not guarantee a similar outcome. © 2017 Sidley Austin LLP.



ASSOCIATE

Benjamin Beaton

Commercial Litigation and Disputes

Supreme Court and Appellate

White Collar: Government Litigation & Investigations

BBEATON@SIDLEY.COM

WASHINGTON, D.C. +1 202 736 8344

BENJAMIN BEATON is a litigator in the Washington, D.C. office. He represents individuals and corporations in appeals, civil litigation, criminal matters and federal regulatory proceedings. At every level of the federal and state courts, Ben has handled cases involving tough questions of constitutional, statutory and administrative law. He litigates cases from start to finish—from legal strategy, dispositive motions, and depositions through witness prep, mediation, trial, and appeal.

At the start of his legal career, Ben clerked on the U.S. Supreme Court for Justice Ruth Bader Ginsburg and the U.S. Court of Appeals for the D.C. Circuit for Judge A. Raymond Randolph. Since joining Sidley, he has maintained a broad practice, representing clients such as the University of Kentucky and Lexmark at the U.S. Supreme Court; litigating First Amendment, contract, and class-action disputes in trial courts; helping establish the Kentucky Business Council; and counseling clients on federal investigations, regulatory risks, and financial exposure.

Ben's recent trial-level experience includes several significant civil and administrative matters:

- *In re SIFMA* (Securities and Exchange Commission) – counsel for trade association at a week-long adversarial hearing and appeal in a challenge to stock exchange fees.
- *Wyatt v. Owens* (W.D. Va.) – tried case to a successful jury verdict in civil-rights suit.
- *In re NII Securities Litigation* (E.D. Va.) – defense counsel for officers in securities fraud class action.
- *Chamber of Commerce v. Dep't of Labor* (N.D. Tex.) – counsel for a trade association challenging one of the largest-ever federal rulemakings.
- *Anthony Williams et al. v. Duke Energy* (S.D. Ohio) – defense counsel in a class action arising out of the deregulation of Ohio electricity rates.

- *Clear Channel v. City of Baltimore* (D. Md.) – plaintiff's counsel in First Amendment challenge to municipal sign ordinance.
- Counsel for a pharmaceutical distributor in a breach-of-contract dispute in Kentucky state court.

Appeals that Ben has handled include:

- [*Lexmark v. Impression Products*](#), 785 F.3d 565 (Fed. Cir.) (en banc) – successfully represented plaintiff print-cartridge manufacturer in closely watched patent-exhaustion appeal.
- [*EME Homer City Generation, L.P. v. EPA*](#), 795 F.3d 118 (D.C. Cir.) – successfully challenged EPA's interstate-transport rule on remand from the U.S. Supreme Court.
- *Baptist Health v. Clouse*, --- S.W.3d ---- (Ky. 2016) – successfully urged reversal of *Tibbs v. Bunnell*, 448 S.W.3d 796 (Ky. 2014), on a question of national significance for healthcare providers regarding the preemptive force of the Patient Safety and Quality Improvement Act.
- *Groves v. United States* (4th Cir.) – lead appellate counsel in successful due-process challenge to a criminal forfeiture order.
- *O'Neal v. United States* (D.C. Cir.) – argued as court-appointed amicus curiae in criminal bank-fraud appeal.

Ben traveled to London, England, as a 2012 Temple Bar Scholar, and twice worked on property-rights issues in Kampala, Uganda, as an International Justice Mission legal fellow.

Before attending law school, Ben served as deputy chief of staff for the Kentucky Cabinet for Health and Family Services and as a legislative assistant in the U.S. House of Representatives.

PRO BONO

Ben provides pro bono representation and counseling to Grace Meridian Hill Presbyterian Church, a new church serving Washington, D.C.'s Columbia Heights neighborhood.

MEMBERSHIPS AND ACTIVITIES

- Centre College, President's Advisory Council
- Edward Coke Appellate Inn of Court
- American Bar Association, Administrative Law Section

PUBLICATIONS

- [*En Banc Federal Circuit Rejects Rule of Automatic Exhaustion: Four Things You Should Know About Lexmark v. Impression*](#), *Sidley Update* (February 15, 2016)
- *View from Temple Bar: Proximity and Professionalism in London*, *THE BENCHER* (March/April 2014)
- [*Walking the Federalist Tightrope*](#), 108 COLUM. L. REV. 1670 (2008)

EVENTS

- [*Centre College 2015 Constitution Day Lecture, Our Human Constitution: The Supreme Court and*](#)

[the Liberal Arts.](#)

- U.S. Supreme Court 2014–15 Term-in-Review, Federalist Society Louisville Lawyers' Chapter (Sept. 15, 2015).

SERVICES

Commercial Litigation and Disputes
Supreme Court and Appellate

White Collar: Government Litigation & Investigations

ADMISSIONS & CERTIFICATIONS

U.S. Supreme Court
U.S. Court of Appeals, 3rd Circuit
U.S. Court of Appeals, 4th Circuit
U.S. Court of Appeals, 5th Circuit
U.S. Court of Appeals, 6th Circuit
U.S. Court of Appeals, 9th Circuit

U.S. Court of Appeals, D.C. Circuit
U.S. Court of Appeals, Federal Circuit
U.S. District Court, District of Columbia
District of Columbia
Kentucky

EDUCATION

Columbia University School of Law, J.D., 2009 (James Kent Scholar, articles editor of the Columbia Law Review)
Centre College of Kentucky, B.A., 2003 (*summa cum laude*, *Phi Beta Kappa*)

CLERKSHIPS

Ruth Bader Ginsburg, United States Supreme Court (2011 - 2012)
A. Raymond Randolph, U.S. Court of Appeals, D.C. Circuit (2009 - 2010)

Attorney Advertising - Sidley Austin LLP, One South Dearborn, Chicago, IL 60603. + 1 312 853 7000. Sidley and Austin refer to Sidley Austin LLP and affiliated partnerships as explained at www.sidley.com/disclaimer. Prior results do not guarantee a similar outcome. © 2017 Sidley Austin LLP.



ASSOCIATE

Morgan Branch

Commercial Litigation and Disputes
White Collar: Government Litigation & Investigations

MBRANCH@SIDLEY.COM

WASHINGTON, D.C. +1 202 736 8810

MORGAN BRANCH is an associate in Sidley's Commercial Litigation and Disputes and White Collar practices. Morgan represents corporate and individual clients in complex commercial government enforcement litigation, investigations and commercial litigation matters. Morgan has represented clients in matters involving, among others, the Federal Trade Commission Act (FTCA), False Claims Act (FCA), Foreign Corrupt Practices Act (FCPA) and the Civil Right Act (CRA).

Prior to joining Sidley, Morgan was a pro bono fellow at Legal Aid Society D.C., where she represented low income housing tenants in eviction cases.

MEMBERSHIPS AND ACTIVITIES

- Women's Bar Association of D.C.

SERVICES

Commercial Litigation and Disputes

White Collar: Government Litigation & Investigations

ADMISSIONS & CERTIFICATIONS

District of Columbia

Georgia

EDUCATION

Georgetown University Law Center, J.D., 2015

University of Georgia, B.A., 2010

Attorney Advertising - Sidley Austin LLP, One South Dearborn, Chicago, IL 60603. +1 312 853 7000. Sidley and Sidley Austin refer to Sidley Austin LLP and affiliated partnerships as explained at www.sidley.com/disclaimer. Prior results do not guarantee a similar outcome. © 2017 Sidley Austin LLP.



ASSOCIATE

Daniel J. Hay

*Commercial Litigation and Disputes
Supreme Court and Appellate*

DHAY@SIDLEY.COM

WASHINGTON, D.C. +1 202 736 8048

DANIEL HAY is an associate in the Commercial Litigation and Disputes and Supreme Court and Appellate practice groups. He represents individuals and corporations in appeals, civil litigation, criminal matters and federal regulatory proceedings.

Prior to joining Sidley, Daniel completed a D.C. Bar Association Pro Bono Fellowship at the Becket Fund for Religious Liberty. While at the Becket Fund, Daniel represented several religious non-profits in appeals involving the federal Religious Freedom Restoration Act. He was also part of a team that successfully defended the constitutionality of a World War II memorial on public land. Before attending law school, Daniel worked as a middle school math teacher with Teach for America and as an aide to a member of Congress.

*Admitted only in New York; pending approval of application for admission to the DC Bar, practicing law in the District of Columbia under the supervision of principals of the firm who are members in good standing of the DC Bar.

PUBLICATIONS

- Baptizing *O'Brien* : Towards Intermediate Protection of Religiously Motivated Express Conduct, 68 *Vand. L. Rev.* 177 (2015).

SERVICES

Commercial Litigation and Disputes

Supreme Court and Appellate

ADMISSIONS & CERTIFICATIONS

U.S. Court of Appeals, 2nd Circuit

New York

U.S. Court of Appeals, Federal Circuit

EDUCATION

Vanderbilt University Law School, J.D., 2015 (John W. Wade Scholar, Order of the Coif, Editor-in-Chief, *Vanderbilt Law Review*)
Wilmington University, M.A., 2011
The King's College, B.A., 2010 (*magna cum laude*)

CLERKSHIPS

Steven M. Colloton, U.S. Court of Appeals, 8th Circuit (2015 - 2016)

Attorney Advertising - Sidley Austin LLP, One South Dearborn, Chicago, IL 60603. + 1 312 853 7000. Sidley and Sidley Austin refer to Sidley Austin LLP and affiliated partnerships as explained at www.sidley.com/disclaimer. Prior results do not guarantee a similar outcome. © 2017 Sidley Austin LLP.



ASSOCIATE

Robin Wright

*Commercial Litigation and Disputes
Privacy, Data Security and Information Law*

RWRIGHT@SIDLEY.COM

WASHINGTON, D.C. +1 202 736 8321

ROBIN WRIGHT is a member of the Civil, Criminal & Constitutional Litigation group where she focuses on issues related to privacy, cybersecurity and information law.

Prior to joining Sidley, Robin was an associate at a national law firm where she focused her practice on corporate transactions and commercial litigation. She gained broad legal experience conducting rules checks for SEC filings, drafting limited liability company agreements and assisting in the defense of a pharmacy benefit manager against claims brought under the Texas Prompt Pay laws.

*Admitted only in Arkansas; pending approval of application for admission to the DC Bar, practicing law in the District of Columbia under the supervision of principals of the firm who are members in good standing of the DC Bar.

MEMBERSHIPS AND ACTIVITIES

- Member of the American Bar Association, Young Lawyers Division
- Member of the Arkansas Bar Association

PUBLICATIONS

- Conspiring to Create Jurisdiction: Gibbs v. PrimeLending and the Conspiracy Theory of in Personam Jurisdiction in Arkansas, *Arkansas Law Review* (2012)

SERVICES

Big Data, Internet of Things and Artificial Intelligence
Commercial Litigation and Disputes
Cybersecurity, Cybercrime and Data Breaches
Healthcare Information and Privacy

Information Security and Data Breaches
Privacy, Data Security and Information Law
Technology, Media and Privacy Law

ADMISSIONS & CERTIFICATIONS

Arkansas

EDUCATION

University of Arkansas School of Law, J.D., 2013 (*magna cum laude*)

Washington and Lee University, B.A., 2009 (*magna cum laude*)

CLERKSHIPS

U.S. Court of Appeals, 8th Circuit (2015 - 2016)

U.S. District Court, W.D. of Arkansas (2014 - 2015)

Attorney Advertising - Sidley Austin LLP, One South Dearborn, Chicago, IL 60603. + 1 312 853 7000. Sidley and Sidley Austin refer to Sidley Austin LLP and affiliated partnerships as explained at www.sidley.com/disclaimer. Prior results do not guarantee a similar outcome. © 2017 Sidley Austin LLP.

EXHIBIT 1-B



SIDLEY AUSTIN LLP
ONE SOUTH DEARBORN STREET
CHICAGO, IL 60603
+1 312 853 7000
+1 312 853 7036 FAX

BEIJING
BOSTON
BRUSSELS
CENTURY CITY
CHICAGO
DALLAS
GENEVA
HONG KONG
HOUSTON
LONDON
LOS ANGELES
MUNICH
NEW YORK
PALO ALTO
SAN FRANCISCO
SHANGHAI
SINGAPORE
SYDNEY
TOKYO
WASHINGTON, D.C.

FOUNDED 1866

May 19, 2017

For professional services rendered re:
Michael Wyatt, Section 1983 Matter
Client-Matter 66519-90020

TIME SUMMARY

Name	Hours
Benjamin Beaton	693.7
Cara R. Viglucci Lopez	440.1
Daniel J. Hay	431.1
Erin E. Lyons	766.1
Gordon D. Todd	180.5
Morgan Branch	280.1
Robin Wright	115.1
Total Hours	2906.7

TIME DETAIL

Date	Name	Hours	Description ¹
2/10/2016	Benjamin Beaton	1.00	Initial review of Wyatt matter including conference with G. Todd
2/11/2016	Benjamin Beaton	0.25	Office conference with G. Todd
2/12/2016	Gordon D. Todd	0.60	Confer with B. Beaton regarding taking on representation, strategy, appearance, and other preliminary issues
2/12/2016	Benjamin Beaton	1.25	Review record for new Wyatt matter
2/12/2016	Benjamin Beaton	1.00	Meeting with G. Todd regarding trial prep
2/12/2016	Benjamin Beaton	0.50	Work on appearance forms, pro hac, initial filings
2/16/2016	Benjamin Beaton	2.00	Review record materials for trial prep
2/16/2016	Benjamin Beaton	0.25	Office conference with G. Todd regarding trial prep
2/17/2016	Benjamin Beaton	2.00	Trial prep, including legal research, correspondence
2/18/2016	Benjamin Beaton	1.50	Review case materials
2/18/2016	Benjamin Beaton	0.25	Office conference with S. Bryant regarding case management
2/19/2016	Gordon D. Todd	1.00	Prep for and confer with B. Beaton regarding strategy for case development
2/19/2016	Benjamin Beaton	0.80	Meeting with G. Todd regarding trial prep
2/19/2016	Benjamin Beaton	0.90	Review records of Wyatt litigation
2/23/2016	Benjamin Beaton	1.50	Telephone call with client
2/23/2016	Benjamin Beaton	0.50	Prep for call with client

¹ Plaintiff's counsel makes this disclosure only in support of a fee award and does not waive attorney-client privilege.

May 19, 2017

Page 2

2/23/2016	Benjamin Beaton	0.50	Correspond with G. Todd, opposing counsel
2/24/2016	Benjamin Beaton	0.25	Revise engagement letter
2/25/2016	Benjamin Beaton	0.25	Correspond with opposing counsel regarding schedule
2/26/2016	Benjamin Beaton	0.50	Confer with V. Seitz regarding pro hac issues and staffing
2/26/2016	Benjamin Beaton	0.25	Finalize engagement letter
2/26/2016	Benjamin Beaton	0.25	Office conference with G. Todd, B. Mundel regarding trial prep
2/26/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding trial prep
2/27/2016	Benjamin Beaton	0.25	Research discovery issues
2/29/2016	Gordon D. Todd	0.30	Calls with B. Beaton and M. Branch regarding staffing
2/29/2016	Benjamin Beaton	0.75	Call with J. Guynn and M. Branch
2/29/2016	Benjamin Beaton	0.30	Telephone conference with G. Todd regarding counsel conference
2/29/2016	Benjamin Beaton	0.25	Call prep
2/29/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding discovery prep
2/29/2016	Benjamin Beaton	0.10	Telephone conference with potential expert
2/29/2016	Benjamin Beaton	0.25	Finalize pro hac vice motions
2/29/2016	Morgan Branch	0.50	Call with B. Beaton and opposing counsel regarding meeting with judge for scheduling order
3/2/2016	Gordon D. Todd	3.50	Review case history and docket information
3/2/2016	Morgan Branch	1.00	Prepare and file pro hac vice motion
3/3/2016	Gordon D. Todd	6.00	Review and analyze case history, pleadings, legal strategy, and discovery plan
3/3/2016	Benjamin Beaton	0.25	Telephone conference with S. Jones (daughter)
3/3/2016	Benjamin Beaton	0.25	Email with team regarding investigation
3/3/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding investigation
3/3/2016	Benjamin Beaton	0.25	Submit ECF filing registration
3/4/2016	Gordon D. Todd	1.50	Work on litigation strategy
3/4/2016	Benjamin Beaton	0.25	Correspond with Sidley team regarding investigation
3/5/2016	Benjamin Beaton	0.25	Email with G. Todd regarding discovery and investigation planning
3/6/2016	Benjamin Beaton	0.50	Meeting prep
3/6/2016	Morgan Branch	1.00	Update workplan for Wyatt case and circulate
3/7/2016	Gordon D. Todd	0.50	Confer with team regarding timing and strategy
3/7/2016	Benjamin Beaton	0.75	Office conference regarding investigation
3/7/2016	Morgan Branch	0.50	Wyatt team meeting
3/8/2016	Gordon D. Todd	0.30	Review draft scheduling order
3/8/2016	Benjamin Beaton	0.50	Office conference with M. Branch regarding scheduling order
3/8/2016	Benjamin Beaton	0.50	Work on scheduling order and interviews
3/9/2016	Morgan Branch	0.50	Update work plan
3/10/2016	Morgan Branch	1.00	Create/revise updated work plan
3/11/2016	Benjamin Beaton	1.00	Phone interview with Talmage Wyatt regarding evidence
3/11/2016	Benjamin Beaton	0.30	Call with A. Wyatt regarding evidence
3/11/2016	Morgan Branch	0.75	Call with B. Beaton and client's father
3/11/2016	Morgan Branch	0.50	Call with B. Beaton and client's wife
3/16/2016	Benjamin Beaton	0.75	Telephone conference with J. Guynn; revise scheduling motion
3/16/2016	Benjamin Beaton	0.25	Correspond with opposing counsel
3/16/2016	Benjamin Beaton	0.25	Finalize scheduling motion
3/16/2016	Morgan Branch	3.00	Review Wyatt documents in preparation for discovery requests
3/17/2016	Benjamin Beaton	0.50	Telephone conference with M. Branch regarding discovery
3/17/2016	Benjamin Beaton	0.25	Office conference with G. Todd regarding discovery strategy
3/17/2016	Morgan Branch	1.00	Email and call with B. Beaton regarding discovery steps

May 19, 2017

Page 3

3/21/2016	Gordon D. Todd	1.00	Call with magistrate judge
3/21/2016	Benjamin Beaton	0.50	Office conference with M. Branch regarding discovery
3/21/2016	Benjamin Beaton	0.25	Review A. Wyatt files
3/21/2016	Benjamin Beaton	1.00	Telephone conference with magistrate judge regarding scheduling
3/21/2016	Benjamin Beaton	0.50	Magistrate call prep
			Call with judge and opposing counsel re: scheduling order; read and review materials from witness; update players list; update witness interview notes; draft notice of appearance; create discovery templates and start drafting discovery requests; review materials for discovery
3/21/2016	Morgan Branch	5.70	
3/22/2016	Benjamin Beaton	1.80	Revise discovery requests
3/22/2016	Benjamin Beaton	0.50	Work on discovery issues including expert search, witness calls, review files
3/22/2016	Morgan Branch	1.50	Draft discovery documents
3/23/2016	Benjamin Beaton	0.50	Telephone conference with H. Rosenbaum
3/23/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding witness interview
3/23/2016	Benjamin Beaton	2.50	Review and revise discovery requests
3/23/2016	Benjamin Beaton	0.75	Telephone conference with J. Guyun, H. Rosenbaum regarding discovery
3/23/2016	Morgan Branch	2.00	Draft discovery documents
3/24/2016	Benjamin Beaton	0.75	Revise discovery requests
			Work on discovery issues, including correspondence regarding witness interviews; revise into notes
3/24/2016	Benjamin Beaton	0.50	Finalize third-party discovery requests; implement edits; start drafting interrogatories and party discovery requests; fact research
3/24/2016	Morgan Branch	3.00	
3/25/2016	Benjamin Beaton	0.25	Work on discovery requests
3/25/2016	Morgan Branch	4.50	Draft discovery requests
3/26/2016	Benjamin Beaton	1.75	Revise discovery requests
3/26/2016	Benjamin Beaton	0.25	Email with Sidley team regarding discovery
			Draft and edit HIPAA waivers and medical request letters; send letter to Wyatt
3/28/2016	Morgan Branch	2.50	
3/31/2016	Gordon D. Todd	1.80	Review and revise draft discovery
3/31/2016	Benjamin Beaton	1.25	Draft motion to withdraw; review discovery requests
3/31/2016	Morgan Branch	3.50	Revise party and third-party discovery requests for final review
4/1/2016	Benjamin Beaton	0.25	Correspond with opposing counsel regarding pleadings
4/1/2016	Benjamin Beaton	0.50	Edit and review offensive discovery
			Draft notice of third-party subpoenas, revise and finalize all party and third-party discovery requests, and prepare and serve subpoenas and discovery requests on third parties
4/1/2016	Morgan Branch	7.50	
4/2/2016	Gordon D. Todd	0.50	Review draft discovery
4/4/2016	Morgan Branch	1.00	Prepare and serve discovery requests on defendants
4/5/2016	Gordon D. Todd	0.30	Review and revise draft discovery
4/5/2016	Benjamin Beaton	0.25	Telephone conference with M. Branch regarding discovery
			Draft initial disclosures; draft and serve subpoenas on third-parties and parties
4/5/2016	Morgan Branch	4.00	Review initial disclosures; office conference with M. Branch regarding discovery issues
4/6/2016	Benjamin Beaton	1.50	
4/6/2016	Morgan Branch	2.00	Draft and revise initial disclosures
4/6/2016	Morgan Branch	1.00	Finish initial disclosures and draft talking points for call with client
4/7/2016	Gordon D. Todd	1.50	Review discovery and related issues
			Telephone conference with M. Branch, M. Wyatt regarding initial disclosures
4/7/2016	Benjamin Beaton	0.50	
4/7/2016	Morgan Branch	2.00	Call with M. Wyatt and type call notes
4/8/2016	Morgan Branch	1.00	Complete and file R. Keeling motion to withdraw as counsel

May 19, 2017
Page 4

4/8/2016	Morgan Branch	1.50	Finalize and serve initial disclosures on opposing counsel and review their initial disclosures
4/9/2016	Benjamin Beaton	0.25	Review initial disclosures and plaintiffs' documents
4/11/2016	Gordon D. Todd	0.50	Team strategy meeting
4/11/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding discovery
4/11/2016	Benjamin Beaton	0.25	Office conference with G. Todd, M. Branch regarding outstanding discovery issues
4/11/2016	Benjamin Beaton	0.25	Team meeting regarding case update and initial disclosures
4/11/2016	Morgan Branch	0.50	Begin researching and preparing additional third party discovery and HIPAA waiver
4/11/2016	Morgan Branch	0.75	Confer with M. Branch regarding discovery issues outstanding
4/15/2016	Benjamin Beaton	0.25	Review subpoena and background research
4/18/2016	Benjamin Beaton	0.25	Meet and confer with Danville City attorney
4/19/2016	Benjamin Beaton	1.00	Work on discovery issues
4/19/2016	Benjamin Beaton	0.25	Draft Wyatt call memorandum and circulate
4/19/2016	Morgan Branch	2.00	Call with city attorney regarding subpoena
4/19/2016	Morgan Branch	1.00	Work on discovery issues, including documents requests, revisions to memo to file, email to City attorney
4/20/2016	Benjamin Beaton	1.25	Correspond with Danville City attorney regarding discovery requests
4/20/2016	Benjamin Beaton	0.25	Revise and serve third party subpoena on Danville Sheriff's office
4/20/2016	Morgan Branch	1.00	Office conference with M. Branch regarding discovery issues
4/21/2016	Benjamin Beaton	0.25	Research and revise search terms
4/22/2016	Benjamin Beaton	0.75	Email counsel regarding discovery
4/22/2016	Benjamin Beaton	0.25	Review and edit memorandum documenting call with police department
4/25/2016	Morgan Branch	1.00	Work on discovery issues including expert retention, client letter and police department search terms
4/26/2016	Benjamin Beaton	1.25	Telephone conference with potential expert
4/26/2016	Benjamin Beaton	0.75	Emails with references and G. Todd regarding potential expert
4/26/2016	Benjamin Beaton	0.25	Call with B. Beaton and potential expert; research statute of limitations and relation back law
4/26/2016	Morgan Branch	1.75	Call with Dawn Jones
4/27/2016	Morgan Branch	0.50	Review interview notes and discovery
4/28/2016	Gordon D. Todd	4.00	Office conference with M. Branch regarding discovery issues
4/28/2016	Benjamin Beaton	0.50	Meet with B. Beaton and revise memorandum documenting the call with the police department
4/28/2016	Morgan Branch	1.00	Work on expert retention, including analysis of expert fee shifting and contract terms
4/29/2016	Benjamin Beaton	0.75	Telephone conference with M. Branch; email with A. Hallowell; legal standards research
5/2/2016	Benjamin Beaton	0.75	Watch discovery videos
5/2/2016	Benjamin Beaton	0.25	Review dashcam videos and strategize regarding same
5/3/2016	Gordon D. Todd	1.50	Telephone conference with M. Branch regarding case file review
5/3/2016	Benjamin Beaton	0.25	Emails with Sidley team regarding discovery
5/3/2016	Benjamin Beaton	0.25	Research law on rule 15(c)
5/3/2016	Morgan Branch	2.00	Review discovery produced by defendants including documents and additional videos
5/4/2016	Gordon D. Todd	2.00	Office conference with M. Branch regarding discovery
5/4/2016	Benjamin Beaton	0.25	Analyze production
5/4/2016	Benjamin Beaton	0.25	Continue research on rule 15(c)
5/4/2016	Morgan Branch	1.75	Meet to discuss case; prepare binder; review video footage and create chronology, per M. Branch
5/4/2016	Erin E. Lyons	5.50	

May 19, 2017

Page 5

5/5/2016	Benjamin Beaton	0.25	Email with Sidley team regarding discovery issues
5/5/2016	Morgan Branch	1.00	Prepare materials to send to expert for review
5/5/2016	Erin E. Lyons	0.50	Prepare and assemble binder of case materials, per M. Branch
5/6/2016	Gordon D. Todd	2.00	Review discovery
5/6/2016	Morgan Branch	4.00	Draft email with Rule 15(c) research regarding adding new defendants to complaint
5/8/2016	Morgan Branch	4.00	Review Danville police department discovery and draft proposed search terms
5/9/2016	Gordon D. Todd	2.50	Review discovery materials and strategize regarding depositions and trial
5/9/2016	Benjamin Beaton	0.50	Meet/confer with J. Guynn
5/9/2016	Benjamin Beaton	0.25	Telephone conference with P. Perkins regarding search terms
5/9/2016	Benjamin Beaton	0.75	Review discovery materials
5/9/2016	Benjamin Beaton	0.75	Office conference with M. Branch, emails with G. Todd, P. Perkins, M. Korman regarding offensive discovery
5/9/2016	Morgan Branch	2.00	Call with opposing counsel and follow-up research
5/10/2016	Benjamin Beaton	0.25	Revise Danville search terms
5/10/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding e-discovery
5/10/2016	Morgan Branch	2.00	Draft search terms for Danville City Police department
5/11/2016	Gordon D. Todd	1.00	Review videos and ediscovery proposal
5/11/2016	Morgan Branch	1.00	Revise search terms for Danville City Police department
5/11/2016	Morgan Branch	0.50	Draft email to opposing counsel
5/12/2016	Morgan Branch	2.00	Read discovery from City Sheriff's office
5/13/2016	Benjamin Beaton	1.25	Draft revised search terms for City discovery
5/13/2016	Benjamin Beaton	0.25	Draft discovery correspondence for J. Guynn
5/13/2016	Morgan Branch	0.50	Revise search terms for Danville police department
5/14/2016	Benjamin Beaton	0.25	Review defendants' production
5/16/2016	Gordon D. Todd	0.50	Review discovery responses and discuss same with B. Beaton and M. Branch
5/16/2016	Benjamin Beaton	0.25	Review evidentiary materials
5/17/2016	Benjamin Beaton	0.50	Office conference with M. Branch regarding discovery issues
5/17/2016	Morgan Branch	0.75	Meet with B. Beaton re: Wyatt task list
5/18/2016	Gordon D. Todd	1.00	Call with use of force expert
5/18/2016	Benjamin Beaton	1.50	Prep for and call with Denny Waller regarding expert testimony
5/18/2016	Benjamin Beaton	0.50	Work on discovery issues
5/18/2016	Morgan Branch	1.25	Call with use of force expert
5/19/2016	Morgan Branch	1.50	Revise search terms, send discovery, research amended complaint
5/20/2016	Benjamin Beaton	0.50	Revise motion to amend
5/20/2016	Morgan Branch	0.50	Prepare materials to send to expert
5/20/2016	Morgan Branch	4.00	Research and draft motion to amend complaint
5/20/2016	Morgan Branch	1.00	Review and revise protective order and circulate to opposing counsel
5/22/2016	Gordon D. Todd	1.00	Review discovery answers and work on strategy
5/22/2016	Benjamin Beaton	1.25	Research and revise motion to amend
5/23/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding motion to amend
5/23/2016	Morgan Branch	3.00	Research and draft motion and memorandum of law in support of motion for leave to amend complaint
5/24/2016	Benjamin Beaton	0.25	Telephone conference with opposing counsel
5/24/2016	Benjamin Beaton	1.75	Revise motion to amend
5/24/2016	Morgan Branch	4.00	Research and draft motion and memorandum of law in support of motion for leave to amend complaint
5/24/2016	Erin E. Lyons	2.75	Review and process filings, exhibits and miscellaneous court records, per M. Branch

May 19, 2017

Page 6

5/25/2016	Gordon D. Todd	1.00	Review motion for leave to amend complaint
5/25/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding discovery
5/25/2016	Morgan Branch	3.00	Draft amended complaint
5/25/2016	Erin E. Lyons	3.00	Review and save court records and documentation, per M. Branch
5/26/2016	Benjamin Beaton	1.00	Review discovery materials
5/26/2016	Morgan Branch	1.50	Prepare for and call Client regarding case update and motion to amend
			Revise amended complaint, motion to amend, and draft email to opposing counsel
5/26/2016	Morgan Branch	2.00	
5/27/2016	Benjamin Beaton	0.50	Office conference with M. Branch; revise pleadings
5/27/2016	Morgan Branch	1.50	Fact-check, revise, and finalize motion to amend and amended complaint
6/1/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding discovery issues
6/5/2016	Morgan Branch	2.50	Review documents and work on timeline/proof outline
			Prepare for meet/confer; revise discovery requests; email additional associates for help
6/6/2016	Benjamin Beaton	0.75	
6/6/2016	Benjamin Beaton	0.50	Telephone conference with M. Branch regarding discovery tasks outstanding
6/6/2016	Morgan Branch	2.00	Call with B. Beaton with case status and draft email to opposing counsel
			Coordinate with Danville city personnel about upcoming document production
6/6/2016	Morgan Branch	1.00	
6/7/2016	Benjamin Beaton	0.50	Confer with city regarding e-discovery
			Coordinate with Danville City representatives; draft subpoena to police academy
6/7/2016	Morgan Branch	2.00	
6/8/2016	Morgan Branch	1.00	Meet and confer with opposing counsel
			Meet and confer with Jim Guynn; prepare for same; review City Police production
6/9/2016	Benjamin Beaton	1.00	
6/9/2016	Benjamin Beaton	0.75	Revise motion to amend and complaint
6/10/2016	Benjamin Beaton	0.50	Finalize motion to amend complaint and proposed order
6/10/2016	Morgan Branch	1.50	Revise and file motion to amend complaint and amended complaint
			Office conferences with T. Loss-Eaton, M. Branch regarding deposition and expert prep
6/13/2016	Benjamin Beaton	0.75	
6/13/2016	Benjamin Beaton	0.75	Telephone conference with D. Waller regarding Rule 26 disclosure
6/13/2016	Benjamin Beaton	0.25	Office conference with A. Smith regarding evidence research
6/13/2016	Morgan Branch	5.00	Research basic law of 1983 excessive force claim and create proof outline
6/13/2016	Morgan Branch	1.00	Prepare for and call expert regarding expert disclosure deadline
6/14/2016	Benjamin Beaton	0.25	Office conference with M. Branch, E. Lyons regarding case management
6/14/2016	Morgan Branch	2.00	Research and draft proof outline
			Meeting to discuss case and upcoming assignments; follow up with docketing for CompuLaw alerts
6/14/2016	Erin E. Lyons	1.00	
6/15/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding witness interview
6/15/2016	Benjamin Beaton	0.25	Correspond with M. Branch regarding deposition outlines
6/15/2016	Benjamin Beaton	0.75	Team meeting regarding discovery
			Prepare for and meet with E. Lyons and B. Beaton regarding task list and case support; update task list; revise events timeline; research and revise proof outline
6/15/2016	Morgan Branch	6.00	Case management meeting; review criminal files and fill in master chronology; update case calendar; schedule weekly meetings
6/15/2016	Erin E. Lyons	5.00	
6/16/2016	Benjamin Beaton	0.25	Work on written discovery
6/16/2016	Morgan Branch	4.00	Research and draft proof outline
			Review and prepare third-party discovery to send to Guynn; draft email to Guynn regarding outstanding items
6/16/2016	Morgan Branch	1.00	
			Coordinate ongoing case meetings and create FTP for discovery production, per M. Branch
6/16/2016	Erin E. Lyons	1.00	

May 19, 2017

Page 7

6/17/2016	Benjamin Beaton	1.00	Office conference with G. Todd, M. Branch; revise proof outline
6/17/2016	Benjamin Beaton	0.75	Office conference with M. Branch regarding deposition prep
			Update key players list and discuss deposition dates and medical expert with B. Beaton
6/17/2016	Morgan Branch	2.00	
6/17/2016	Morgan Branch	1.00	Finalize proof outline for B. Beaton
6/17/2016	Morgan Branch	1.00	Prepare for and meet with B. Beaton regarding proof outline
6/19/2016	Benjamin Beaton	0.25	Review Wyatt exclusion memo
			Draft discovery requests to the EMT company; review discovery and update key players list
6/19/2016	Morgan Branch	3.50	Strategize regarding discovery and Trial including conference with C. Viglucci
6/20/2016	Gordon D. Todd	1.50	Office conference with G. Todd, M. Branch; revise Smith evidence memo; plan litigation scheduling and strategy
6/20/2016	Benjamin Beaton	2.00	Review EMS RFP
6/20/2016	Benjamin Beaton	0.25	Revise, prepare, and serve third-party subpoena on the EMT personnel; draft letter to client with HIPAA waiver; revise deposition list
6/20/2016	Morgan Branch	2.50	
6/21/2016	Gordon D. Todd	2.00	Team conference
6/21/2016	Benjamin Beaton	2.00	Strategy meeting with G. Todd, C. Viglucci Lopez, M. Branch
			Office conference with M. Branch, R. Cohen regarding discovery plan, research
6/21/2016	Benjamin Beaton	0.75	
6/21/2016	Benjamin Beaton	0.25	Telephone conference with C. Viglucci-Lopez regarding case background
6/21/2016	Benjamin Beaton	1.00	Work on task list, discovery requests, and production review
6/22/2016	Gordon D. Todd	0.50	Work on identifying medical expert
	Cara R. Viglucci		Research Medical Center and call various individuals re: past due subpoena response
6/22/2016	Lopez	2.00	
	Cara R. Viglucci		
6/22/2016	Lopez	0.25	Work on identifying medical expert
6/22/2016	Benjamin Beaton	1.00	Team strategy and discovery meeting
6/22/2016	Benjamin Beaton	0.50	Work on jury instructions
6/22/2016	Benjamin Beaton	0.25	Office conference with A. Smith regarding legal research
6/22/2016	Benjamin Beaton	0.25	Work on discovery issues
			Research and analyze jury instructions; draft example jury instructions cheat sheet; Meeting with B. Beaton, E. Lyons, and C. Viglucci regarding case status and upcoming tasks
6/22/2016	Morgan Branch	5.00	Weekly case management meeting; update litigation task list and other case related tasks
6/22/2016	Erin E. Lyons	2.50	
			Review sample jury instructions; confer with Morgan and Ben regarding Nicholson conduct at scene
6/23/2016	Gordon D. Todd	0.50	
6/23/2016	Benjamin Beaton	1.00	Work on expert report and MTC email
6/23/2016	Benjamin Beaton	1.00	Review draft Waller expert report
6/23/2016	Benjamin Beaton	0.50	Email correspondence with Sidley team regarding case strategy
			Correspond with City attorney, defendants regarding outstanding discovery issues
6/23/2016	Benjamin Beaton	1.25	Telephone conference with City attorney regarding discovery issues and email follow-up regarding same
6/23/2016	Benjamin Beaton	1.25	Call with city attorney; emails regarding discovery deficiencies to opposing counsel; call with T. Wyatt; review and compile dates of all discovery communications
6/23/2016	Morgan Branch	5.00	Update task list, coordinate legal call, begin compiling and preparing materials for binders and review and edit email to J. Guynn
6/23/2016	Erin E. Lyons	5.25	
6/24/2016	Gordon D. Todd	1.00	Review and comment on draft expert use of force report
6/24/2016	Benjamin Beaton	0.75	Work on Waller expert report

May 19, 2017

Page 8

6/24/2016	Benjamin Beaton	0.75	Case management meeting
6/24/2016	Benjamin Beaton	0.50	Confer with Sidley team regarding strategy regarding missed filing deadline
			Work on MTC; revise expert report; telephone conference with D. Waller regarding revised report; confer with E. Lyons regarding outstanding discovery tasks
6/24/2016	Benjamin Beaton	1.50	
6/24/2016	Morgan Branch	1.50	Prepare for and meet with team regarding case updates
6/24/2016	Morgan Branch	1.00	Review discovery emails
			Binder preparation, research associated with local rules and motions practice, update task list and document review
6/24/2016	Erin E. Lyons	4.50	
6/26/2016	Benjamin Beaton	0.25	Correspond with Sidley team regarding discovery issues
6/26/2016	Morgan Branch	3.00	Research deposition notice limit and draft legal findings
			Work on identifying local counsel; further review and comment on use of force expert report
6/27/2016	Gordon D. Todd	1.25	
	Cara R. Vigluzzi		
6/27/2016	Lopez	3.50	Review and comment on draft expert report
	Cara R. Vigluzzi		
6/27/2016	Lopez	0.25	Review information re: potential experts
6/27/2016	Benjamin Beaton	1.50	Review Waller expert report
6/27/2016	Benjamin Beaton	0.50	Local counsel outreach
6/27/2016	Benjamin Beaton	0.50	Email and strategy regarding discovery issues
6/27/2016	Benjamin Beaton	0.25	Emails regarding discovery issues
6/27/2016	Morgan Branch	0.50	Preparation and meeting with N. Katzen regarding motion to compel
6/27/2016	Erin E. Lyons	2.75	Document review and legal call coordination, per M. Branch
	Cara R. Vigluzzi		
6/28/2016	Lopez	0.25	Speak to hospital representative re: medical discovery
6/28/2016	Benjamin Beaton	1.25	Confer with co-counsel re discovery efforts
6/28/2016	Benjamin Beaton	0.75	Revise MTC
6/28/2016	Morgan Branch	0.50	Call with client
6/28/2016	Erin E. Lyons	0.75	Legal call with client; draft and send email summarizing legal call
6/29/2016	Gordon D. Todd	0.50	Review and revises draft motion to compel
	Cara R. Vigluzzi		
6/29/2016	Lopez	0.25	Work on medical discovery
6/29/2016	Benjamin Beaton	0.75	Correspond with Sidley team regarding motion to compel
			Research and revise motion to compel; draft email re same to opposing counsel
6/29/2016	Morgan Branch	5.25	
6/30/2016	Benjamin Beaton	0.50	Correspond with team regarding granted motion to amend
6/30/2016	Benjamin Beaton	0.50	Work on discovery issues
6/30/2016	Morgan Branch	4.00	Review, analyze and collect documents for Wyatt key documents binder
			File amended complaint; discovery related tasks; draft email to opposing counsel; review documents
6/30/2016	Morgan Branch	3.50	Scan and review medical records; compile and review materials for litigation and key documents binders, per M. Branch
6/30/2016	Erin E. Lyons	3.50	
7/1/2016	Benjamin Beaton	2.00	Work on discovery requests and meet/confer prep
			Review discovery from Guynn regarding use of force complaints, training materials from academy, and other discovery materials; prepare discovery requests
7/1/2016	Morgan Branch	6.00	
7/1/2016	Morgan Branch	1.00	Prepare for and call J. Guynn regarding discovery
			Pull review and compile materials for key documents and litigation binders, per M. Branch
7/1/2016	Erin E. Lyons	5.50	
7/2/2016	Benjamin Beaton	0.50	Work on discovery issues
7/2/2016	Erin E. Lyons	0.50	Attention to discovery issues
7/4/2016	Benjamin Beaton	0.25	Correspond with M. Branch, E. Lyons regarding discovery requests

May 19, 2017
Page 9

7/5/2016	Cara R. Viglucci Lopez	0.25	Review information re: potential experts
7/5/2016	Cara R. Viglucci Lopez	0.25	Review draft deposition notice
7/5/2016	Benjamin Beaton	1.00	Team meeting
7/5/2016	Benjamin Beaton	0.25	Waller deposition prep
7/5/2016	Benjamin Beaton	1.75	Work on deposition notices and meet/confer prep
7/5/2016	Morgan Branch	1.00	Team meeting
7/5/2016	Erin E. Lyons Cara R. Viglucci	4.50	Weekly case management meeting; draft deposition notices and motion to appear pro hac vice
7/6/2016	Lopez Cara R. Viglucci	1.50	Analyze report of witness discussion and review relevant documents
7/6/2016	Lopez	0.25	Work on deposition schedule
7/6/2016	Benjamin Beaton	0.75	Meet/confer call with J. Guynn
7/6/2016	Benjamin Beaton	0.25	Call prep for J. Guynn meet/confer
7/6/2016	Benjamin Beaton	1.75	Work on deposition prep and scheduling
7/6/2016	Benjamin Beaton	0.75	Telephone conference with Clark Whitfield, Chief Broadfoot; email with J. Guynn and Sidley team regarding depositions
7/6/2016	Benjamin Beaton	0.25	Review discovery materials
7/6/2016	Morgan Branch	2.50	Discovery communications, preparation, and analysis; draft and revise attorney work product on legal analysis
7/6/2016	Erin E. Lyons	8.50	Document preparation and production; team meeting; record and file updates; research other 1983 cases associated with J. Guynn
7/7/2016	Gordon D. Todd Cara R. Viglucci	0.50	Review discovery requests from defendants
7/7/2016	Lopez	0.50	Work on discovery
7/7/2016	Benjamin Beaton	0.50	Office conference with M. Branch, G. Todd regarding deposition prep
7/7/2016	Benjamin Beaton	0.50	Deposition prep
7/7/2016	Benjamin Beaton	0.25	Work on deposition scheduling
7/7/2016	Morgan Branch	2.00	Discovery communications, preparation, and analysis; draft and revise attorney work product on legal analysis
7/7/2016	Erin E. Lyons Cara R. Viglucci	2.00	Review incident reports in order to update master chronology; research rule 33 response time
7/8/2016	Lopez	2.00	Work on discovery and identifying experts
7/8/2016	Benjamin Beaton	1.00	Work on deposition prep
7/8/2016	Morgan Branch	2.00	Discovery communications, preparation, and analysis; draft and revise attorney work product on legal analysis
7/8/2016	Erin E. Lyons Cara R. Viglucci	2.75	Document review and related case work and updates
7/11/2016	Lopez	3.00	Review recent developments and next steps; work on medical expert; review documents
7/11/2016	Benjamin Beaton	1.25	Team meeting regarding discovery
7/11/2016	Benjamin Beaton	0.75	Revise deposition notices
7/11/2016	Benjamin Beaton	0.75	Revise deposition notices and discovery materials
7/11/2016	Erin E. Lyons Cara R. Viglucci	4.00	Weekly case management meeting; revise and update deposition notices; coordinate with court reporting office regarding Waller deposition; research travel options for upcoming trips to Danville
7/12/2016	Lopez	4.50	Review materials; edit communication to opposing counsel; work on expert; work on deposition schedule
7/12/2016	Benjamin Beaton	0.25	Deposition prep
7/12/2016	Morgan Branch	2.50	Review documents and prepare deposition prep folders; revise proof outline

May 19, 2017

Page 10

7/12/2016	Erin E. Lyons	3.50	Revise, prepare and send deposition notices; search for emails associated with Carter
7/13/2016	Cara R. Viglucci		
7/13/2016	Lopez	6.00	Work on deposition schedule; review materials; work on expert; work on discovery; analyze damages question
7/13/2016	Benjamin Beaton	0.75	Deposition correspondence with J. Guynn
7/13/2016	Benjamin Beaton	1.50	Work on discovery and deposition scheduling issues
7/13/2016	Morgan Branch	2.00	Conduct discovery
7/13/2016	Erin E. Lyons	4.25	Review correspondence related to deposition scheduling; communicate with River North regarding upcoming visits; prepare and send deposition notices to non-defendants; create chart to track discovery requests
7/14/2016	Gordon D. Todd	2.25	Weekly team meeting; work on deposition strategy and scheduling; review enhanced video
7/14/2016	Benjamin Beaton	0.50	Prep for team meeting regarding deposition prep
7/14/2016	Benjamin Beaton	1.25	Team meeting regarding discovery
7/14/2016	Benjamin Beaton	0.75	Work on discovery issues
7/14/2016	Morgan Branch	4.25	Team meeting, revise proof outline, review documents for key documents binder, and correspond with team
7/14/2016	Erin E. Lyons	9.25	Case management meeting; prepare, revise and file motion for admission to appear pro hac vice; revise and review contents of litigation and key documents binders; research travel options to Danville; coordinate VTC bridge for Waller deposition and transcribe audio from enhanced file
7/15/2016	Benjamin Beaton	0.25	Prepare for City deposition
7/15/2016	Morgan Branch	6.00	Review and prepare key documents binder
7/15/2016	Erin E. Lyons	8.00	Key documents binder finalization and production; finalize logistics for Waller deposition; communicate and confirm travel to Danville for B. Beaton and M. Branch; follow up with River North regarding upcoming visit
7/18/2016	Cara R. Viglucci		
7/18/2016	Lopez	0.75	Confer with D. Greenfield and M. Branch re: experts and follow up
7/18/2016	Benjamin Beaton	7.25	Meet with D. Waller regarding deposition and direct-examination prep
7/18/2016	Benjamin Beaton	4.50	Work on deposition prep and direct examination questions during flight to Milwaukee for Waller deposition
7/18/2016	Morgan Branch	7.00	Discovery tasks; draft email to opposing counsel regarding email collection; review documents for deposition preparation; research medical expert; team meeting regarding task list
7/18/2016	Erin E. Lyons	6.25	License plate research; coordinate with River North regarding upcoming visit and deposition; training materials research; communicate with Bruce regarding video enhancement
7/19/2016	Gordon D. Todd	8.00	Expert deposition; review research memo from A. Smith; draft template for defendant depositions
7/19/2016	Benjamin Beaton	4.00	Work on discovery and legal issues during travel from Milwaukee after Waller deposition
7/19/2016	Benjamin Beaton	2.00	Defend Waller deposition
7/19/2016	Benjamin Beaton	0.25	Email with Sidley team regarding outstanding discovery requests
7/19/2016	Benjamin Beaton	0.25	Meet and confer with J. Guynn regarding outstanding discovery requests
7/19/2016	Morgan Branch	4.00	Draft deposition prep outline for city police
7/19/2016	Erin E. Lyons	3.00	Watch Waller deposition; prepare and send defendant deposition notices; follow up with River North regarding Wyatt deposition; communicate with VA DOC facilities regarding medical care and the use of outside hospitals
7/20/2016	Gordon D. Todd	0.50	Plan trial strategy
7/20/2016	Benjamin Beaton	0.75	Team meeting regarding upcoming depositions
7/20/2016	Benjamin Beaton	0.25	Email with Sidley team regarding deposition prep

May 19, 2017

Page 11

7/20/2016	Benjamin Beaton	0.50	Confer with M. Branch and E. Lyons regarding deposition and interview preparations
7/20/2016	Benjamin Beaton	0.50	Office conference with G. Todd regarding trial prep
7/20/2016	Morgan Branch	3.00	Draft deposition prep outline for city police
7/20/2016	Morgan Branch	2.00	Team meeting regarding discovery and follow-up discovery items
			Complete legal visit paperwork for G. Todd and C. Viglucci Lopez;
			coordinate court reporter and videographer for upcoming depositions; call
			and arrange interviews with M. Wyatt's family; weekly case management
7/20/2016	Erin E. Lyons	6.00	meeting and associated follow up
7/21/2016	Benjamin Beaton	0.75	Research video admission requirements
			Meeting with G. Todd, M. Branch to review video evidence and
7/21/2016	Benjamin Beaton	0.50	enhancement
			Telephone interview with P. Haskins regarding Commonwealth Attorney
7/21/2016	Benjamin Beaton	0.50	involvement
7/21/2016	Benjamin Beaton	2.25	Work on City Officer deposition outline and exhibits
7/21/2016	Benjamin Beaton	0.75	Deposition prep
7/21/2016	Benjamin Beaton	0.75	Revise motion-and-demand email
			Review, analyze, and prepare deposition exhibits for all Sheriff's office non-
7/21/2016	Morgan Branch	2.00	defendant depositions and Danville city police exhibits
7/21/2016	Morgan Branch	3.00	Draft motion to compel production of emails and send to opposing counsel
			Confirm upcoming deposition logistics; communicate with River North
			regarding client deposition as well as policies and procedures; review
			enhanced video in comparison with original dash footage; preparation for
7/21/2016	Erin E. Lyons	5.50	upcoming trip to Danville
	Cara R. Viglucci		
7/22/2016	Lopez	1.50	Work on discovery and expert
7/22/2016	Benjamin Beaton	0.25	Review defendant's answer
7/22/2016	Benjamin Beaton	0.25	Office conference with M. Branch regarding potential witness interview
7/22/2016	Benjamin Beaton	0.50	Prepare for officer depositions
7/22/2016	Benjamin Beaton	0.50	Office conference with M. Branch regarding deposition prep
7/22/2016	Benjamin Beaton	0.25	Email with Sidley team regarding deposition prep
7/22/2016	Morgan Branch	5.00	Draft Danville city police deposition outline
7/22/2016	Morgan Branch	2.50	Revise motion to compel emails and file with the court
			Email communication with team regarding motion to compel and
7/22/2016	Morgan Branch	1.00	depositions
			Prepare hard copy materials for upcoming depositions; locate photos of
			Danville P.D. Officers Gourley, Abbott and Carter; call with Clarke
			Whitfield; communicate with M. Wyatt's family and confirm upcoming
7/22/2016	Erin E. Lyons	5.75	meetings
7/23/2016	Morgan Branch	2.00	Revise Danville city police deposition outline
7/23/2016	Erin E. Lyons	0.25	Logistics for next week and weekly case management meeting change
7/24/2016	Gordon D. Todd	2.00	Review draft deposition outlines
	Cara R. Viglucci		
7/24/2016	Lopez	2.00	Review and edit deposition outlines
7/24/2016	Benjamin Beaton	0.50	Prepare for officer depositions
7/24/2016	Morgan Branch	2.00	Revise Danville city police deposition outline
7/24/2016	Erin E. Lyons	1.00	Communication and planning associated with upcoming trip to Danville
7/25/2016	Gordon D. Todd	2.00	Review defendants' answer; team meeting
7/25/2016	Benjamin Beaton	3.00	Review produced documents during travel to Danville for depositions
7/25/2016	Benjamin Beaton	0.25	Prepare for travel to Danville, Virginia for investigation and depositions
7/25/2016	Benjamin Beaton	1.00	Prepare for City officer depositions
7/25/2016	Benjamin Beaton	1.00	Team meeting regarding discovery and deposition prep

May 19, 2017

Page 12

7/25/2016	Morgan Branch	7.50	Review, analyze, and prepare deposition exhibits for all Sheriff's office non-defendant depositions and Danville city police exhibits
7/26/2016	Cara R. Viglucci		
7/26/2016	Lopez	4.00	Work on medical experts; review fact documents and analysis re: same; draft communication to opposing counsel
7/26/2016	Cara R. Viglucci		
7/26/2016	Lopez	2.00	Research deponents
7/26/2016	Benjamin Beaton	4.50	Case investigation in Danville including meeting with family and viewing locations
7/26/2016	Benjamin Beaton	0.50	Meeting with M. Branch regarding interviews and deposition prep
7/26/2016	Benjamin Beaton	5.50	Prepare for Broadfoot deposition
7/26/2016	Benjamin Beaton	2.00	Draft Abbott deposition outline
7/26/2016	Benjamin Beaton	1.00	Meeting with M. Branch regarding deposition exhibits and prep
7/26/2016	Morgan Branch	3.50	Visit and take pictures of scene of the arrest, and other locations in Danville relevant to the case; Meet with and interview family members of M. Wyatt
7/26/2016	Morgan Branch	1.00	Review video of post-arrest events and draft team email regarding questions posed by C. Viglucci
7/26/2016	Morgan Branch	5.50	Review documents in preparation for deposition of Clarence Goins and Detective Gourley; revise deposition outline in preparation for deposition of Clarence Goins and Detective Gourley
7/27/2016	Cara R. Viglucci	4.00	Work on medical expert; ecf application; analyze research re: evidentiary questions
7/27/2016	Lopez	2.00	Research deponents
7/27/2016	Benjamin Beaton	7.50	Depose P. Broadfoot and W. Abott
7/27/2016	Benjamin Beaton	2.00	Assist in deposition of M. Gourley
7/27/2016	Benjamin Beaton	1.50	Prepare for Broadfoot, Abbott depositions
7/27/2016	Benjamin Beaton	0.50	Meet with M. Branch regarding Wyatt and County officer deposition prep
7/27/2016	Benjamin Beaton	1.25	Review documents produced by County Sheriff
7/27/2016	Morgan Branch	8.00	Assist with deposition of Chief Broadfoot; assist with deposition of Wilmer Abbott; conduct deposition of Detective Gourley
7/27/2016	Morgan Branch	2.00	Review documents in preparation for deposition of Gerald Ford and William Harris
7/28/2016	Gordon D. Todd	7.00	Review discovery and pleadings; review materials from experts; review defendants' expert reports; review and compare videos; strategy calls with team
7/28/2016	Cara R. Viglucci		
7/28/2016	Lopez	4.00	Work on case development; work on finding expert; work on discovery issues
7/28/2016	Benjamin Beaton	7.25	Interview client at River North prison
7/28/2016	Benjamin Beaton	1.75	Prepare for Taylor deposition
7/28/2016	Benjamin Beaton	0.50	Draft Taylor deposition outline
7/28/2016	Benjamin Beaton	0.50	Email with Sidley team regarding discovery developments
7/28/2016	Benjamin Beaton	0.50	Call with G. Todd and C. Viglucci Lopez regarding discovery and deposition strategy
7/28/2016	Morgan Branch	6.50	Interview M. Wyatt at River North Correctional center
7/28/2016	Morgan Branch	2.00	Call with C. Viglucci and G. Todd regarding meeting with M. Wyatt; discuss meeting with M. Wyatt with B. Beaton and upcoming depositions
7/28/2016	Morgan Branch	4.50	Review documents in preparation for deposition of Gerald Ford and William Harris; draft deposition outlines for deposition of Gerald Ford and William Harris
7/29/2016	Cara R. Viglucci		
7/29/2016	Lopez	4.50	Discuss developments in case with G. Todd, B. Beaton, and M. Branch; research witnesses; work on finding expert; work on discovery issues
7/29/2016	Benjamin Beaton	7.25	Depose M. Taylor
7/29/2016	Benjamin Beaton	2.75	Prepare for Taylor deposition

May 19, 2017
Page 13

7/29/2016	Morgan Branch	8.00	Assist with deposition of Sheriff Taylor; conduct deposition of Gerald Ford
7/31/2016	Benjamin Beaton	0.75	Work on discovery issues regarding ongoing depositions
8/1/2016	Benjamin Beaton	0.30	Office conference with M. Branch regarding outstanding discovery items
8/1/2016	Benjamin Beaton	0.30	Work on discovery issues, including deposition prep and expert search
			Meet with E. Lyon regarding case status; meet with B. Beaton regarding discovery inquiry with opposing counsel; draft email to opposing counsel regarding motion to compel
8/1/2016	Morgan Branch	1.00	Coordinate delivery of rough deposition transcripts; research availability of Pittsylvania County criminal records; meet and discuss case needs; review recently received medical records
8/1/2016	Erin E. Lyons	4.30	Call with team regarding identifying medical experts, motion to compel, and strategy of adding additional claims and defendants
8/2/2016	Gordon D. Todd	0.50	Work on medical expert; strategize re: recent developments and next steps; review draft discovery responses
8/2/2016	Cara R. Vigluzzi Lopez	3.50	
8/2/2016	Benjamin Beaton	0.50	Arrange travel, logistics and prep for defendant depositions
			Telephone conference with C. Vigluzzi-Lopez regarding depositions, medical expert
8/2/2016	Benjamin Beaton	0.30	Correspond with Sidley team regarding discovery requests
8/2/2016	Benjamin Beaton	0.30	Team meeting regarding discovery and claims strategy
8/2/2016	Benjamin Beaton	1.00	Email J. Guynn regarding discovery and scheduling issues
8/2/2016	Benjamin Beaton	0.30	Draft Plaintiff's discovery responses; communicate with team regarding depositions; review documents in preparation for depositions; communicate with opposing counsel regarding discovery deficiencies; call with team regarding discovery
8/2/2016	Morgan Branch	9.00	Coordinate travel and accommodations for upcoming depositions; weekly case management meeting and discussion; research potential medical expert candidates; internal communication regarding client deposition logistics; follow up on rough transcripts following non-defendant depositions
8/2/2016	Erin E. Lyons	4.50	
	Cara R. Vigluzzi		
8/3/2016	Lopez	3.00	Work with potential medical expert
8/3/2016	Benjamin Beaton	1.00	Search for medical expert candidates
8/3/2016	Benjamin Beaton	0.30	Email with Sidley team regarding discovery items
8/3/2016	Benjamin Beaton	0.50	Telephone conferences with M. Branch, J. Guynn regarding interrogatories and deposition scheduling
			Research potential medical experts; communicate with court reporting firm regarding defendant deposition start times; prepare check request for trial transcript; compile and procedure materials for deposition binders
8/3/2016	Erin E. Lyons	6.30	
8/4/2016	Gordon D. Todd	1.30	Review and revise draft responses to defendants ROGs and RFPs
	Cara R. Vigluzzi		
8/4/2016	Lopez	2.00	Work on medical expert
	Cara R. Vigluzzi		
8/4/2016	Lopez	0.50	Prepare for depositions
8/4/2016	Benjamin Beaton	0.30	Office conference with M. Branch regarding deposition prep
8/4/2016	Benjamin Beaton	0.30	Work on deposition prep
			Email with Sidley team regarding deposition prep and outstanding discovery requests
8/4/2016	Benjamin Beaton	0.30	
8/4/2016	Benjamin Beaton	2.00	Revise interrogatory responses and supplemental discovery requests
			Communicate with team regarding plaintiff's discovery responses; draft email to opposing counsel regarding discovery deficiencies; revise discovery Responses
8/4/2016	Morgan Branch	3.00	Draft medical expert limited engagement letter and prepare client records for review; communicate and coordinate with Danville court reporter for M. Wyatt's trial transcript; prepare and compile exhibits for upcoming
8/4/2016	Erin E. Lyons	4.80	

May 19, 2017
Page 14

			defendant depositions; coordinate travel logistics for upcoming trip to Danville
			Confer with team regarding retention of medical expert; confer with team regarding disclosure of Wyatt past conduct vs invoking fifth amendment rights and review related legal research
8/5/2016	Gordon D. Todd Cara R. Viglucci	1.50	
8/5/2016	Lopez Cara R. Viglucci	3.10	Work on medical experts
8/5/2016	Lopez Cara R. Viglucci	5.00	Prepare for depositions
8/5/2016	Lopez	0.50	Strategize with G. Todd re: depositions
8/5/2016	Benjamin Beaton	0.30	Deposition prep
8/5/2016	Benjamin Beaton	0.30	Office conference with E. Lyons regarding discovery requests and responses
8/5/2016	Benjamin Beaton	0.30	Correspond with Sidley team regarding discovery requests and deposition prep
8/5/2016	Benjamin Beaton	0.80	Telephone conference with B. Reed email/correspondence regarding discovery production
8/5/2016	Morgan Branch	5.00	Revise discovery responses; communicate with team regarding defendant deposition; deposition exhibit review and preparation; draft email to the city attorney regarding discovery deficiencies
8/5/2016	Erin E. Lyons Cara R. Viglucci	9.30	Prepare exhibits and binders for upcoming defendant depositions; coordinate travel for C. Viglucci Lopez; obtain videos and rough transcripts from non-defendant depositions; prepare and send revised deposition notices for Harris and Goins;
8/6/2016	Lopez Cara R. Viglucci	1.00	Work on medical experts
8/6/2016	Lopez	9.00	Prepare for depositions
8/6/2016	Benjamin Beaton	0.30	Email correspondence with M. Branch regarding deposition prep
8/7/2016	Gordon D. Todd Cara R. Viglucci	1.00	Correspond with team regarding strategy for Wyatt deposition defense and defendants' depositions; review draft deposition outline
8/7/2016	Lopez	6.00	Prepare for depositions
8/7/2016	Benjamin Beaton	0.30	Defendant deposition prep
8/7/2016	Benjamin Beaton	0.50	Review defense discovery production
8/7/2016	Morgan Branch Cara R. Viglucci	3.00	Communicate with team regarding defendant deposition; draft email to opposing counsel regarding depositions notices; review emails collected during discovery and send email with analysis
8/8/2016	Lopez	9.50	Prepare for depositions
8/8/2016	Benjamin Beaton	2.30	Review deposition exhibits and interrogatories for deposition prep
8/8/2016	Benjamin Beaton	3.50	Review exhibits and deposition prep during travel from DC to Roanoke for Nicholson deposition
8/8/2016	Benjamin Beaton	1.50	Deposition prep for Nicholson and Worsham depositions
8/8/2016	Benjamin Beaton	0.30	Office conference with E. Lyons regarding Wyatt deposition logistics and preparation
8/8/2016	Benjamin Beaton	1.00	Telephone conference with J. Guynn regarding outstanding discovery and draft follow-up emails to defense counsel and Sidley team regarding same
8/8/2016	Morgan Branch	4.00	Communicate with team regarding depositions; listen and analyze jailhouse calls
8/8/2016	Erin E. Lyons Cara R. Viglucci	4.50	Finalize deposition exhibits and binders; review trial transcripts from Pittsylvania County charges; coordinate delivery of responses to defense counsel
8/9/2016	Lopez	9.50	Participate in defendant depositions

May 19, 2017
Page 15

8/9/2016	Cara R. Vigluzzi Lopez	7.00	Prepare for defendant depositions
8/9/2016	Benjamin Beaton	2.30	Prepare for Worsham deposition
8/9/2016	Benjamin Beaton	9.00	Take Nicholson deposition
8/9/2016	Benjamin Beaton	0.50	Email correspondence with M. Branch, E. Lyons regarding defendant deposition prep
8/9/2016	Morgan Branch	5.00	Review documents and draft and revise S. Wyatt deposition outline; communicate with team regarding defendant depositions
8/9/2016	Erin E. Lyons Cara R. Vigluzzi	6.50	Explore social media presence of defendants; FedEx responses to J. Guynn; travel logistics; coordinate upcoming visit to River North
8/10/2016	Lopez Cara R. Vigluzzi	12.80	Participate in defendant depositions
8/10/2016	Lopez	4.50	Prepare for defendant depositions
8/10/2016	Benjamin Beaton	8.00	Depose Worsham
8/10/2016	Benjamin Beaton	1.50	Prepare for Worsham deposition
8/10/2016	Benjamin Beaton	1.00	Assist in S. Wyatt deposition
8/10/2016	Morgan Branch	5.50	Communicate with team regarding defendant depositions; call with potential medical expert; revise defendant Owens' deposition outline
8/10/2016	Erin E. Lyons Cara R. Vigluzzi	6.80	Update and revise discovery tracking and task list; coordinate upcoming travel to Danville for depositions; review enhanced video; coordinate with River North regarding client deposition; review discovery responses
8/11/2016	Lopez Cara R. Vigluzzi	6.50	Participate in defendant depositions
8/11/2016	Lopez	1.30	Prepare for defendant depositions
8/11/2016	Benjamin Beaton	0.30	Draft discovery questions
8/11/2016	Benjamin Beaton	1.30	Work on discovery issues and email responses
8/11/2016	Benjamin Beaton	0.30	Draft discovery demand letter to J. Guynn
8/11/2016	Morgan Branch	1.50	Communicate with team and draft email to opposing counsel regarding rule 612 question
8/11/2016	Erin E. Lyons	2.00	Discuss and coordinate travel for upcoming depositions; coordinate with DOC facility regarding client deposition; review and update task list
8/12/2016	Benjamin Beaton	0.80	Call with co-counsel regarding potential Monell claim
8/12/2016	Benjamin Beaton	0.50	Draft email to G. Todd regarding potential Monell claim
8/12/2016	Erin E. Lyons Cara R. Vigluzzi	3.50	Coordinate logistics associated with client deposition; confirm court reporter and videographer for upcoming depositions; coordinate travel for M. Branch
8/14/2016	Lopez	0.50	Work on discovery
8/15/2016	Gordon D. Todd	1.80	Confer with team regarding strategy of adding a new claim and preparing for M. Wyatt deposition prep
8/15/2016	Benjamin Beaton	0.30	Draft scheduling email to J. Guynn
8/15/2016	Benjamin Beaton	1.00	Meet with M. Branch, G. Todd, E. Lyons regarding outstanding discovery issues
8/15/2016	Benjamin Beaton	0.30	Prep for team meeting regarding discovery
8/15/2016	Benjamin Beaton	0.30	Work on supplemental discovery requests
8/15/2016	Morgan Branch	7.50	Review documents in preparation for depositions; prepare deposition exhibits; communicate with team regarding upcoming depositions; prepare pre materials for Plaintiff's deposition
8/15/2016	Erin E. Lyons	7.30	Weekly case management meeting; preparation of exhibits for upcoming depositions; coordination of client deposition and associated logistics; finalize travel arrangements for M. Branch; research W.D. Va rules
8/16/2016	Gordon D. Todd	8.00	Prep for client deposition including client meeting

May 19, 2017
Page 16

8/16/2016	Cara R. Viglucci Lopez	1.50	Work on medical expert
8/16/2016	Morgan Branch	12.00	Deposition preparation with Plaintiff; review jail calls; prepare for deposition
8/16/2016	Erin E. Lyons	3.50	Coordinate logistics associated with client deposition; prepare and send revised deposition notices; prepare FTP link with client medical records for expert review
8/17/2016	Gordon D. Todd Cara R. Viglucci	4.00	Defend client deposition; confer with B. Beaton regarding discovery strategies
8/17/2016	Lopez	1.70	Work on medical expert
8/17/2016	Benjamin Beaton	0.40	Office conference with C. Viglucci-Lopez regarding expert search
8/17/2016	Benjamin Beaton	0.50	Send discovery demand and email correspondence regarding remaining discovery requests
8/17/2016	Benjamin Beaton	2.20	Work on discovery requests and defense correspondence
8/17/2016	Morgan Branch	13.00	Defendant Wyatt deposition; review and prepare for officer depositions
8/17/2016	Erin E. Lyons Cara R. Viglucci	1.50	Draft explanatory discovery cover letter to J. Guynn; coordinate payment and delivery of deposition transcripts; communicate with Danville City Attorney regarding hard copy materials
8/18/2016	Lopez	2.20	Work on medical experts
8/18/2016	Benjamin Beaton	0.50	Review discovery material produced by defendants
8/18/2016	Benjamin Beaton	1.70	Draft discovery requests
8/18/2016	Benjamin Beaton	1.20	Finalize and serve discovery requests
8/18/2016	Benjamin Beaton	1.00	Draft supplemental discovery requests
8/18/2016	Morgan Branch	14.00	Depositions of officer Goins and defendant Shelton; draft and prepare supplemental discovery requests; review documents and draft deposition outline for officer Harris
8/18/2016	Erin E. Lyons Cara R. Viglucci	4.80	Prepare and send supplemental discovery requests; communicate with court reporting firm regarding transcripts and payment, per B. Beaton
8/19/2016	Lopez	2.00	Work on medical expert
8/19/2016	Benjamin Beaton	0.30	Office conference with G. Todd, M. Branch regarding depositions
8/19/2016	Benjamin Beaton	0.70	Telephone conference with P. Haskins regarding production and privilege claims
8/19/2016	Benjamin Beaton	0.20	Email with M. Branch, E. Lyons, D. Waller regarding discovery issues
8/19/2016	Morgan Branch	9.50	Deposition of officer Harris; communicate with team regarding depositions and supplemental discovery
8/19/2016	Erin E. Lyons Cara R. Viglucci	0.50	Internal communication regarding medical expert and associated records and waivers
8/22/2016	Lopez	3.00	Work on medical experts
8/22/2016	Benjamin Beaton	1.00	Team meeting regarding discovery status
8/22/2016	Benjamin Beaton	0.30	Call with M. Raven, B. Jones re WSET subpoena
8/22/2016	Morgan Branch	1.00	Communicate with team regarding experts/scheduling phone call
8/22/2016	Morgan Branch	1.00	Meet with Wyatt team
8/22/2016	Erin E. Lyons	1.00	Update task list and calendar for weekly meeting; gather and send necessary documents to River North for upcoming legal call
8/23/2016	Benjamin Beaton	0.20	Emails with Sidley team regarding damages expert
8/23/2016	Benjamin Beaton	0.20	Telephone conference with B. Jones regarding WSET subpoena
8/23/2016	Benjamin Beaton	0.20	Work on discovery issues
8/23/2016	Morgan Branch	0.50	Call with potential medical expert
8/23/2016	Erin E. Lyons	0.50	Prepare check requests and submit outstanding invoices for payment

May 19, 2017

Page 17

8/23/2016	Erin E. Lyons	1.00	Internal and external communication regarding deposition transcript delivery and payment
8/24/2016	Benjamin Beaton	0.30	Work on medical expert disclosures
8/24/2016	Benjamin Beaton	0.20	Telephone conference with C. Viglucci-Lopez regarding medical expert
8/24/2016	Benjamin Beaton	0.10	Email to Sidley team and opposing counsel regarding scheduling concerns
8/24/2016	Benjamin Beaton	0.90	Review Waller deposition transcript for errata
8/24/2016	Benjamin Beaton	0.20	Work on expert discovery
8/24/2016	Benjamin Beaton	0.20	Correspond with defendant counsel regarding production deficiencies
8/24/2016	Morgan Branch	0.50	Medical expert communication with team
8/24/2016	Erin E. Lyons	2.00	Internal conversations regarding medical expert and associated follow up, including the preparation of records for expert review
8/24/2016	Erin E. Lyons	1.00	Legal call with M. Wyatt
8/24/2016	Erin E. Lyons	1.50	Review deposition transcripts for relevant sections pertaining to medical expert review
8/24/2016	Erin E. Lyons	0.50	Coordinate payment and delivery of deposition transcripts
8/25/2016	Cara R. Viglucci Lopez	3.50	Work on medical analysis and expert work
8/25/2016	Benjamin Beaton	0.30	Work on medical expert search
8/25/2016	Benjamin Beaton	0.20	Office conference with M. Branch regarding expert witness
8/25/2016	Benjamin Beaton	0.40	Correspond with defendants and Sidley team regarding expert depositions
8/25/2016	Benjamin Beaton	0.10	Serve deposition notice
8/25/2016	Morgan Branch	1.00	Communicate with team and draft correspondence
8/25/2016	Erin E. Lyons	2.00	Research associated with medical expert inquiry
8/25/2016	Erin E. Lyons	0.50	Communicate with the W.D. of Virginia clerk's office regarding a hearing on motion to compel
8/25/2016	Erin E. Lyons	0.50	Coordinate check request and payment for deposition transcripts and videos
8/26/2016	Cara R. Viglucci Lopez	2.00	Work on medical analysis and expert work
8/26/2016	Cara R. Viglucci Lopez	1.50	Prepare for and confer with expert consultant
8/26/2016	Cara R. Viglucci Lopez	2.00	Review depositions
8/26/2016	Benjamin Beaton	0.20	Telephone conference with E. Lyons regarding deposition citations
8/26/2016	Benjamin Beaton	0.30	Review defendants' discovery material
8/26/2016	Benjamin Beaton	0.50	Telephone conference with B. Haskins regarding subpoena
8/26/2016	Morgan Branch	0.50	Communicate with team regarding medical expert
8/26/2016	Erin E. Lyons	2.00	Update FTP with materials intended for expert review
8/26/2016	Erin E. Lyons	0.50	Upload deposition videos, transcripts and exhibits
8/28/2016	Cara R. Viglucci Lopez	1.20	Prepare for and confer with expert consultant
8/29/2016	Gordon D. Todd	0.70	Review and comment on draft medical expert report
8/29/2016	Cara R. Viglucci Lopez	3.60	Work on medical analysis and expert work
8/29/2016	Benjamin Beaton	0.40	Revise medical expert report
8/29/2016	Benjamin Beaton	0.20	Email with Sidley team regarding medical expert report
8/29/2016	Benjamin Beaton	0.20	Office conference with G. Todd regarding discovery and scheduling
8/29/2016	Benjamin Beaton	0.40	Work on motion
8/29/2016	Benjamin Beaton	0.50	Review defendants' email production
8/30/2016	Gordon D. Todd	1.00	Strategize regarding medical experts and reports
8/30/2016	Cara R. Viglucci Lopez	3.20	Work on medical analysis and expert work

May 19, 2017

Page 18

8/30/2016	Benjamin Beaton	0.20	Telephone conference with C. Viglucci regarding scheduling and defendant transcripts
8/30/2016	Benjamin Beaton	0.20	Review medical expert report
8/30/2016	Erin E. Lyons	1.00	Update FTP to include additional materials for expert review
8/30/2016	Erin E. Lyons	0.50	Locate receipt for deposition related expenses for reimbursement
8/30/2016	Erin E. Lyons	2.50	Locate and add citations to deposition transcripts to Motion to Amend Complaint
8/31/2016	Cara R. Viglucci	4.50	Work on medical analysis and expert work
8/31/2016	Lopez	6.50	Review and revise amended complaint and compile exhibits
8/31/2016	Erin E. Lyons	0.50	Finalize and send subpoena to Dominion Eye Center
9/1/2016	Erin E. Lyons	0.40	Review and revise draft correspondence with defense counsel regarding discovery issues
9/1/2016	Gordon D. Todd	7.00	Work on expert report
9/1/2016	Cara R. Viglucci	1.40	Work on expert report and deposition prep
9/1/2016	Lopez	1.20	Work on response to motion to quash
9/1/2016	Benjamin Beaton	0.10	Telephone conference with M. Branch, E. Lyons regarding conforming brief
9/1/2016	Benjamin Beaton	4.00	Revise amended complaint and associated exhibits; coordinate printing and delivery of hard copy materials
9/1/2016	Erin E. Lyons	1.90	Review final draft expert report; review defense motions for summary judgment and motion in limine
9/2/2016	Gordon D. Todd	2.90	Work on expert report
9/2/2016	Cara R. Viglucci	1.30	Telephone conference with D. Waller regarding deposition prep
9/2/2016	Lopez	0.40	Prepare for expert deposition
9/2/2016	Benjamin Beaton	0.10	Office conference with G. Todd regarding expert deposition prep
9/2/2016	Benjamin Beaton	0.60	Review MSJ and MIL regarding expert report
9/2/2016	Benjamin Beaton	0.10	Office conference P. Ray regarding MSJ response
9/2/2016	Benjamin Beaton	1.50	Communicate with team regarding medical experts; review latest experts reports; prepare for Wershale deposition
9/2/2016	Morgan Branch	0.80	Draft and circulate revised scheduling proposal
9/3/2016	Benjamin Beaton	0.20	Review Wershale expert report
9/3/2016	Benjamin Beaton	0.90	Draft Wershale deposition outline
9/5/2016	Benjamin Beaton	6.30	Prep for Wershale deposition
9/5/2016	Benjamin Beaton	0.10	Office conference with M. Branch regarding deposition prep
9/5/2016	Benjamin Beaton	0.30	Work on expert discovery issues
9/5/2016	Morgan Branch	4.00	Research law for motion to quash and draft email to B. Beaton
9/5/2016	Morgan Branch	2.50	Review Wershale deposition outline and prepare exhibits
9/6/2016	Cara R. Viglucci	0.20	Work on expert report
9/6/2016	Lopez	0.40	Finalize and circulate scheduling proposal to opposing counsel
9/6/2016	Benjamin Beaton	0.50	Meet and confer with Jim Guynn regarding scheduling and discovery disputes
9/6/2016	Benjamin Beaton	4.50	Take Wershale expert deposition
9/6/2016	Benjamin Beaton	3.50	Prepare for Wershale deposition during travel from DC to Richmond
9/6/2016	Benjamin Beaton	0.50	Draft email memo for Sidley team regarding deposition and scheduling
9/6/2016	Benjamin Beaton	0.40	Emails with Sidley team regarding discovery efforts
9/6/2016	Benjamin Beaton	1.00	Communicate with team regarding scheduling order
9/6/2016	Morgan Branch	1.50	Communicate with the W.D. Va clerk's office regarding filing error and associated internal communication and review of corrected filing
9/6/2016	Erin E. Lyons		

May 19, 2017

Page 19

9/6/2016	Erin E. Lyons Cara R. Viglucci	0.50	Internal communication regarding expert deposition
9/7/2016	Lopez	1.00	Work on expert report
9/7/2016	Benjamin Beaton	0.10	Office conference with M. Branch regarding medical expert reports
9/7/2016	Benjamin Beaton	0.10	Office conference with M. Branch regarding medical discovery
9/8/2016	Erin E. Lyons	0.50	Prepare and send check requests for outstanding case related invoices
9/9/2016	Benjamin Beaton	0.50	Work on scheduling issues
9/9/2016	Benjamin Beaton	0.30	Correspond with J. Guynn, M. Branch regarding scheduling motion
9/9/2016	Benjamin Beaton	0.20	Work on scheduling motion
9/9/2016	Morgan Branch	1.00	Communicate with team regarding discovery and upcoming filings and start opposition research
9/9/2016	Erin E. Lyons	0.50	Follow up with Cook & Wiley regarding defense expert deposition transcript and exhibits, per B. Beaton
9/10/2016	Benjamin Beaton Cara R. Viglucci	0.10	Email with Sidley team regarding motion practice
9/11/2016	Lopez	0.20	Work on schedule for interviews and depositions
9/11/2016	Benjamin Beaton	0.10	Emails with Sidley team regarding motions drafting
9/11/2016	Morgan Branch	3.50	Research legal standards and case law on opposition to motion to quash
9/12/2016	Gordon D. Todd	0.50	Weekly status and strategy call with team
9/12/2016	Benjamin Beaton	0.50	Office conference with W. Shen regarding motion to exclude
9/12/2016	Benjamin Beaton	0.30	Work on opposition to motion to exclude
9/12/2016	Benjamin Beaton	0.10	Telephone conference with E. Lyons regarding motions filings
9/12/2016	Benjamin Beaton	0.50	Team meeting with G. Todd, M. Branch regarding discovery and motions practice
9/12/2016	Morgan Branch	3.50	Draft opposition to motion to quash
9/12/2016	Erin E. Lyons Cara R. Viglucci	0.50	Internal communication related to task list and calendar
9/13/2016	Lopez	0.20	Review materials from medical expert
9/13/2016	Benjamin Beaton	0.30	Prepare for magistrate telephone hearing
9/13/2016	Benjamin Beaton	0.30	Participate in magistrate scheduling hearing
9/13/2016	Benjamin Beaton	0.40	Telephone conference with M. Branch regarding hearing and motions prep
9/13/2016	Benjamin Beaton	2.40	Revise motion to dismiss opposition
9/13/2016	Benjamin Beaton	1.30	Revise motion to quash
9/13/2016	Benjamin Beaton	0.80	Research discovery caselaw
9/13/2016	Morgan Branch	6.00	Draft opposition to motion to quash
9/13/2016	Erin E. Lyons	0.50	Locate and send requested documents, per P. Ray
9/13/2016	Erin E. Lyons	0.50	Upload and send WSET videos for production to defense counsel, per B. Beaton
9/13/2016	Erin E. Lyons	0.50	Update internal task list and case calendar, per B. Beaton
9/14/2016	Gordon D. Todd	0.50	Review draft opposition to motion to quash
9/14/2016	Benjamin Beaton	3.60	Revise opposition to motion to quash
9/14/2016	Benjamin Beaton	1.70	Review and research motion to amend opposition
9/14/2016	Benjamin Beaton	1.50	Revise MSJ opposition
9/14/2016	Benjamin Beaton	1.40	Prepare exhibits and brief for filing
9/14/2016	Benjamin Beaton	1.10	Revise MSJ opposition
9/14/2016	Morgan Branch	1.00	Finalize opposition to motion to quash and file
9/14/2016	Erin E. Lyons	2.50	Pull documents and prepare exhibits to accompany opposition to motion to quash
9/15/2016	Gordon D. Todd	0.80	Review draft opposition to motion for summary judgment
9/15/2016	Benjamin Beaton	0.30	Office conference with M. Branch regarding motions

May 19, 2017

Page 20

9/15/2016	Benjamin Beaton	2.10	Revise motion to exclude
9/15/2016	Benjamin Beaton	0.30	Emails with Sidley team regarding motions practice
9/15/2016	Benjamin Beaton	0.20	Revise MSJ opposition
9/15/2016	Morgan Branch	1.00	Review draft motions and oppositions and communicate with team
9/15/2016	Erin E. Lyons	0.50	Finalize and prepare exhibits for production, per B. Beaton
9/15/2016	Erin E. Lyons	0.50	File and save expert reports and deposition transcripts
9/15/2016	Erin E. Lyons	0.50	Prepare exhibits to accompany opposition to motion for summary judgment
9/16/2016	Gordon D. Todd	1.20	Review and revise draft opposition to motion in limine
9/16/2016	Benjamin Beaton	1.00	Revise motion in limine opposition
9/16/2016	Benjamin Beaton	1.70	Revise and finalize motions
9/16/2016	Benjamin Beaton	0.50	Office conference with M. Branch regarding pending motions
9/16/2016	Benjamin Beaton	0.20	Office conference with M. Branch, G. Todd regarding motion to correct
9/16/2016	Benjamin Beaton	0.20	Email with B. Marum, M. Branch regarding motions research
9/16/2016	Morgan Branch	5.50	Read eleventh amendment cases and draft email to B. Beaton and B. Marum regarding legal analysis
9/16/2016	Erin E. Lyons	4.50	Review, proof, compile exhibits and file oppositions to Motion in Limine and Motion for Summary Judgment, per B. Beaton
9/17/2016	Benjamin Beaton	0.40	Research emails regarding motion to withdraw and correct
9/17/2016	Benjamin Beaton	0.10	Correspond with B. Marum regarding motion for leave
9/18/2016	Benjamin Beaton	2.10	Revise motion to correct
9/19/2016	Benjamin Beaton	2.00	Revise motion and complaint
9/19/2016	Benjamin Beaton	0.60	Finalize motion to correct for filing
9/19/2016	Benjamin Beaton	0.50	Office conference with D. Hay regarding motions research
9/19/2016	Benjamin Beaton	0.40	Revise motion to correct
9/19/2016	Benjamin Beaton	0.30	Office conference with B. Marum regarding motion to correct
9/19/2016	Benjamin Beaton	0.20	Office conference with P. Ray regarding SOL argument
9/19/2016	Benjamin Beaton	0.20	Draft proposed order
9/19/2016	Benjamin Beaton	0.10	Revise motion to correct
9/19/2016	Benjamin Beaton	0.10	Revise SOL opposition
9/19/2016	Benjamin Beaton	0.10	Office conference with M. Branch regarding motion to correct
9/19/2016	Daniel J. Hay	0.30	Meet with B. Beaton to discuss case background
9/20/2016	Benjamin Beaton	0.20	Telephone conference with D. Waller regarding defense expert testimony
9/20/2016	Benjamin Beaton	0.20	Office conference with D. Hay regarding damages research
9/20/2016	Benjamin Beaton	0.80	Work on hearing prep including email to opposing counsel and Sidley team regarding arguments and discovery status
9/20/2016	Benjamin Beaton	0.80	Office conference with M. Branch regarding outstanding motions and discovery tasks
9/20/2016	Benjamin Beaton	0.10	Office conference with M. Branch regarding discovery issues
9/20/2016	Daniel J. Hay	1.80	Research evidentiary issue regarding damages
9/20/2016	Daniel J. Hay	0.30	Meet with B. Beaton re: damages research
9/20/2016	Daniel J. Hay	0.30	Speak with M. Branch re: upcoming motions practice
9/21/2016	Benjamin Beaton	0.20	Review damages memo
9/21/2016	Benjamin Beaton	0.10	Office conference with D. Hay regarding damages research
9/21/2016	Benjamin Beaton	0.20	Review motion to quash reply
9/21/2016	Benjamin Beaton	0.10	Prep for motions hearing
9/21/2016	Benjamin Beaton	0.20	Work on discovery issues
9/21/2016	Daniel J. Hay	2.60	Research on evidentiary issues pertaining to noneconomic damages
9/22/2016	Benjamin Beaton	0.10	Email to co-counsel regarding motions practice
9/22/2016	Benjamin Beaton	0.20	Correspond with D. Hay and M. Branch regarding motions and expert prep

May 19, 2017

Page 21

9/22/2016	Daniel J. Hay Cara R. Viglucchi	0.50	Research procedure for authenticating medical records and photographs
9/23/2016	Lopez Cara R. Viglucchi	0.20	Work on expert issues
9/23/2016	Lopez	0.60	Review communication from opposing counsel re: depositions
9/23/2016	Benjamin Beaton	0.50	Prep for motions hearing
9/23/2016	Erin E. Lyons	1.00	Internal communication regarding emails with defense counsel
9/25/2016	Daniel J. Hay	3.40	Review motions ahead of 9/28 hearing.
9/26/2016	Gordon D. Todd Cara R. Viglucchi	0.40	Review newly received discovery from defendants
9/26/2016	Lopez	1.00	Work on expert issues and next steps in case
9/26/2016	Benjamin Beaton	0.20	Review produced documents
9/26/2016	Benjamin Beaton	0.10	Office conference with G. Todd, D. Hay regarding hearing
9/26/2016	Benjamin Beaton	0.20	Office conference with M. Branch regarding trial prep
9/26/2016	Benjamin Beaton	0.50	Work on outstanding discovery questions
9/26/2016	Benjamin Beaton	1.10	Office conference with M. Branch, D. Hay regarding hearing prep Prepare updated testimony list for medical expert and disclose to opposing party; Meet with B. Beaton and D. Hay regarding upcoming arguments for hearing; Communicate with team regarding upcoming arguments and other discovery issues (2.00).
9/26/2016	Morgan Branch	4.50	
9/26/2016	Erin E. Lyons	0.50	Review, locate and send requested complaints
9/26/2016	Erin E. Lyons	1.00	Review defendants deposition transcripts for contradictions
9/26/2016	Erin E. Lyons	0.50	Prepare and send request for payment for Wershba deposition Confer with M. Branch and B. Beaton regarding upcoming motions arguments
9/27/2016	Gordon D. Todd	0.50	
9/27/2016	Benjamin Beaton	5.80	Prepare for argument at magistrate hearing
9/27/2016	Benjamin Beaton	0.80	Office conference with G. Todd, M. Branch regarding hearing prep Follow up on outstanding motions questions; research relevance of defendants' past bad acts
9/27/2016	Daniel J. Hay	5.30	Communicate with team regarding upcoming arguments and damages expert issues
9/27/2016	Morgan Branch	2.00	
9/27/2016	Morgan Branch	6.00	Research and prepare for opposition to motion to quash
9/27/2016	Erin E. Lyons	0.50	Coordinate production of documents for upcoming hearing
9/28/2016	Gordon D. Todd	1.50	Oral argument on discovery motions and motion to amend
9/28/2016	Benjamin Beaton	3.90	Prepare for argument at magistrate hearing
9/28/2016	Benjamin Beaton	0.70	Participate in magistrate hearing on motion to amend quash
9/28/2016	Benjamin Beaton	0.80	Draft notice of supplemental authority Work on outstanding discovery and motions issues, including co-counsel email responses, discovery follow-up, and hearing prep
9/28/2016	Benjamin Beaton	1.40	Prepare for hearing with Judge Ballou and opposition to motion to quash at hearing
9/28/2016	Morgan Branch	3.50	
9/28/2016	Morgan Branch	2.00	Review damages proof outline and draft email to team regarding medical personnel depositions Reach supplemental case authority and file notice of supplemental authority relating to motion to amend complaint
9/28/2016	Morgan Branch	1.50	
9/28/2016	Erin E. Lyons	2.00	Review and organize filings and discovery related materials
9/28/2016	Erin E. Lyons	2.00	Prepare materials for and attend telephonic motions hearing
9/29/2016	Benjamin Beaton	0.50	Prepare for trial admissibility and objections questions
9/29/2016	Benjamin Beaton	0.40	Work on outstanding discovery issues
9/29/2016	Benjamin Beaton	0.20	Office conference with M. Branch regarding medical discovery
9/29/2016	Daniel J. Hay	0.70	Consolidate and update research for upcoming motions practice and trial.

May 19, 2017
Page 22

9/29/2016	Morgan Branch	0.50	Draft subpoenas and coordinate service on Danville Regional Medical Center
9/29/2016	Erin E. Lyons	0.50	Research Danville area process servers
9/29/2016	Erin E. Lyons	0.50	Prepare transcript order form for motions hearing
9/30/2016	Benjamin Beaton	0.10	Prepare for summary judgment hearing
9/30/2016	Daniel J. Hay	0.40	Review pending motions for summary judgment and to exclude evidence
9/30/2016	Erin E. Lyons	0.50	Prepare, review and file transcript request, per B. Beaton
10/1/2016	Daniel J. Hay	1.60	Reviewed and researched legal issues presented in motion for summary judgment.
10/2/2016	Daniel J. Hay	4.30	Reviewed and researched legal issues presented in motion in limine.
10/3/2016	Gordon D. Todd	0.70	Strategy meeting with B. Beaton and M. Branch
10/3/2016	Benjamin Beaton	0.80	Office conference with G. Todd, M. Branch regarding hearing prep
10/3/2016	Benjamin Beaton	8.60	Prepare for motions arguments at hearing
10/3/2016	Daniel J. Hay	3.80	Researched issues relating to motion to exclude damages expert.
10/3/2016	Morgan Branch	2.00	Communicate with team members regarding hearing and prepare for relevant argument in opposition to motion to quash
10/4/2016	Gordon D. Todd	2.50	Reviewing deposition testimony
10/4/2016	Benjamin Beaton	4.20	Confer with G. Todd, M. Branch on trial strategy and prep during travel back from hearing
10/4/2016	Benjamin Beaton	3.80	Prep for argument during travel to Lynchburg for hearing
10/4/2016	Benjamin Beaton	1.40	Review caselaw to prepare for motions hearing
10/4/2016	Benjamin Beaton	1.00	Argue motions hearing
10/4/2016	Benjamin Beaton	0.20	Email M. Branch regarding trial prep
10/4/2016	Daniel J. Hay	1.00	Research issues related to motions hearing; meet with M. Branch to discuss the same.
10/4/2016	Morgan Branch	9.00	Hearing; confer with G Todd and B. Beaton re trial prep and strategy during travel from Lynchburg to DC after hearing
10/4/2016	Erin E. Lyons	0.50	Pull and send requested materials to M. Branch
10/5/2016	Gordon D. Todd	3.00	Review deposition testimony
10/5/2016	Benjamin Beaton	0.20	Confer with Sidley team regarding privileges and 30(b)(6) questions
10/5/2016	Benjamin Beaton	0.10	Telephone conference with D. Hay regarding pretrial motions research
10/5/2016	Benjamin Beaton	0.70	Office conference with G. Todd, M. Branch regarding trial prep
10/5/2016	Daniel J. Hay	1.40	Research matters related to upcoming motions and trial strategy
10/5/2016	Morgan Branch	1.30	Communicate with team and trial preparation
10/5/2016	Erin E. Lyons	0.50	Correspondence with River North regarding logistics
10/6/2016	Benjamin Beaton	0.60	Review and confer with G. Todd, M. Branch regarding defendant's supplemental filing
10/6/2016	Benjamin Beaton	0.30	Research privilege question regarding work product
10/6/2016	Benjamin Beaton	2.20	Work on trial prep including Rule 26 privilege research, witness examination assignments, and exhibit prep
10/6/2016	Daniel J. Hay	3.40	Research matter related to discovery requests
10/7/2016	Gordon D. Todd	2.50	Review deposition transcripts
10/7/2016	Gordon D. Todd	0.40	Work on trial schedule, strategy, and responsibilities
10/7/2016	Benjamin Beaton	0.90	Office conference with G. Todd, M. Branch, D. Hay regarding hearsay, medical records
10/7/2016	Benjamin Beaton	0.40	Research work product privilege
10/7/2016	Benjamin Beaton	0.80	Confer with G. Todd, M. Branch regarding trial presentation
10/7/2016	Benjamin Beaton	0.40	Telephone conference with G. Todd regarding trial assignments
10/7/2016	Benjamin Beaton	0.10	Work on trial prep
10/7/2016	Daniel J. Hay	1.30	Research relating to damages evidence and Rule 803(4)

May 19, 2017
Page 23

10/7/2016	Daniel J. Hay	0.80	Research related to work-product doctrine
			Communicate with Danville Regional Medical Center regarding deposition of medical personnel; communicate with team members regarding deposition of medical personnel
10/7/2016	Morgan Branch	2.00	
10/7/2016	Erin E. Lyons	1.00	Coordinate trial logistics
10/8/2016	Gordon D. Todd	3.00	Continue to review deposition transcripts
	Cara R. Viglucci		
10/8/2016	Lopez	0.20	Analyze witness deposition testimony
10/8/2016	Benjamin Beaton	0.40	Emails with Sidley team regarding trial prep
10/9/2016	Gordon D. Todd	4.20	Continue to review deposition transcripts
10/10/2016	Gordon D. Todd	2.00	Continue reviewing deposition transcripts
10/10/2016	Benjamin Beaton	0.20	Office conference with D. Hay regarding damages and evidence research
10/10/2016	Benjamin Beaton	0.70	Office conference with R. Wright, M. Branch regarding trial prep
10/10/2016	Benjamin Beaton	0.30	Office conference with M. Branch, E. Lyons regarding trial prep
10/10/2016	Benjamin Beaton	0.20	Review discovery emails
10/10/2016	Daniel J. Hay	2.60	Research past 1983 cases tried by opposing counsel
10/10/2016	Daniel J. Hay	2.00	Research related to subrogation of incarceration expenses
10/10/2016	Morgan Branch	1.00	Communication with team and trial preparation
10/10/2016	Morgan Branch	1.00	Communication with team and trial preparation
10/10/2016	Daniel J. Hay	1.10	Research question related to damages cap
10/10/2016	Erin E. Lyons	1.00	Upload and review L.A. Shelton deposition video
10/11/2016	Gordon D. Todd	2.00	Continue to review deposition transcripts
			Work on trial preparations including assignments, attention to potential exhibits and demonstratives
10/11/2016	Gordon D. Todd	2.50	Office conference with R. Wright regarding jury instructions and background review Waller report
10/11/2016	Benjamin Beaton	0.90	
10/11/2016	Benjamin Beaton	0.20	Confer with R. Wright on research questions
10/11/2016	Benjamin Beaton	0.30	Office conference with G. Todd regarding motion in limine
10/11/2016	Benjamin Beaton	1.50	Work on trial prep and damages research
10/11/2016	Robin Wright	0.70	Meet with B. Beaton to discuss Wyatt case
10/11/2016	Daniel J. Hay	0.50	Research pertaining to trial strategy
10/11/2016	Morgan Branch	1.00	Communication with team and trial preparation
10/11/2016	Erin E. Lyons	1.00	Update and reorganize case shared drive
			Review newly produced documents relating to use of force history and Sheriff department records
10/12/2016	Gordon D. Todd	1.40	
10/12/2016	Gordon D. Todd	0.30	Review orders denying defendants' motions
10/12/2016	Gordon D. Todd	4.00	Continue to review deposition transcripts
10/12/2016	Gordon D. Todd	1.00	Attention to offensive motions in limine
10/12/2016	Benjamin Beaton	0.50	Review summary judgment order
10/12/2016	Benjamin Beaton	0.20	Work on magistrate appeal motion
10/12/2016	Benjamin Beaton	0.50	Office conference with G. Todd regarding trial prep
10/12/2016	Benjamin Beaton	0.30	Trial prep emails with Sidley team
10/12/2016	Robin Wright	1.90	Researched jury instructions for excessive force claim
			Review newly produced documents and create tracking chart with use of force complain information
10/12/2016	Morgan Branch	6.10	Communicate with team; trial strategy and preparation; communicate with trial graphics vendor
10/12/2016	Morgan Branch	2.70	
10/12/2016	Erin E. Lyons	1.50	Review and reorganize case related documents stored on the shared drive
10/12/2016	Erin E. Lyons	1.00	Discuss transcripts with Lit Support in light of use of Case Note; following up with Accurate Court Reporting

May 19, 2017
Page 24

10/13/2016	Gordon D. Todd	2.50	Continue to review deposition testimony
10/13/2016	Gordon D. Todd	3.00	Team trial strategy and preparation meeting
10/13/2016	Gordon D. Todd	2.00	Strategize regarding trial preparation including review of pre-trial orders, schedule, and prepare assignment checklist and calendar
10/13/2016	Benjamin Beaton	4.80	Revise motions for extension and to add defendant
10/13/2016	Benjamin Beaton	2.50	Trial prep meeting with G. Todd and Sidley team
10/13/2016	Benjamin Beaton	0.70	Confer with J. Guynn, G. Todd regarding scheduling and trial prep questions
10/13/2016	Robin Wright	0.50	Researched jury instructions
10/13/2016	Robin Wright	2.70	Attend Wyatt pretrial meeting
10/13/2016	Robin Wright	0.20	Type notes from pretrial meeting
10/13/2016	Daniel J. Hay	2.60	Attend trial team meeting
10/13/2016	Morgan Branch	1.00	Call with Michael Wyatt and Dr. Smith
10/13/2016	Morgan Branch	1.00	Draft motion for an extension and share with opposing counsel
10/13/2016	Morgan Branch	1.50	Review newly discovered emails; trial preparation and strategy
10/13/2016	Morgan Branch	2.50	Trial strategy meeting
10/13/2016	Morgan Branch	2.50	Trial preparation
10/13/2016	Erin E. Lyons	1.00	Legal call with client and Dr. Smith
10/13/2016	Erin E. Lyons	2.50	Trial strategy and planning meeting
10/14/2016	Benjamin Beaton	0.50	Revise Rule 72 motion
10/14/2016	Benjamin Beaton	0.30	Office conference with M. Branch, D. Hay regarding motions practice
10/14/2016	Benjamin Beaton	0.50	Office conferences with G. Todd, M. Branch regarding trial prep
10/14/2016	Robin Wright	1.50	Research motion to exclude evidence
10/14/2016	Robin Wright	0.40	Discuss pretrial preparation with M. Branch; jury instructions, motion to exclude evidence
10/14/2016	Morgan Branch	1.00	Process and review documents
10/14/2016	Morgan Branch	1.00	Trial preparation
10/14/2016	Morgan Branch	1.00	Communicate with team regarding trial strategy
10/14/2016	Daniel J. Hay	2.20	Research scope of permissible expert testimony
10/14/2016	Erin E. Lyons	1.00	Prepare exhibits to accompany filing
10/14/2016	Erin E. Lyons	1.00	Discuss trial exhibits and demonstratives with Lit Support and Z. Lantos
10/15/2016	Daniel J. Hay	2.20	Research relating to scope of expert testimony and use of exhibits in opening statement
10/16/2016	Benjamin Beaton	0.20	Email with Sidley team regarding motions practice
10/16/2016	Robin Wright	1.60	Research motion to exclude gun
10/16/2016	Daniel J. Hay	2.30	Research scope of expert testimony and bases to exclude past UOF complaints.
10/16/2016	Morgan Branch	3.00	Jury size research
10/17/2016	Benjamin Beaton	0.40	Telephone conference with J. Guynn regarding continuance
10/17/2016	Benjamin Beaton	0.20	Office conference with G. Todd regarding depositions and hearsay
10/17/2016	Benjamin Beaton	0.10	Telephone conference with R. Wright regarding research
10/17/2016	Benjamin Beaton	0.20	Office conference with M. Branch, D. Hay regarding motions
10/17/2016	Benjamin Beaton	0.10	Finalizing motion for filing
10/17/2016	Benjamin Beaton	0.10	Telephone conference with M. Branch regarding Wyatt motions
10/17/2016	Benjamin Beaton	0.30	Confer with Sidley team regarding trial prep steps
10/17/2016	Benjamin Beaton	0.20	Confer with local counsel regarding trial practice
10/17/2016	Robin Wright	2.00	Outline research for motion to exclude gun
10/17/2016	Erin E. Lyons	1.00	Coordinate with River North regarding trial related logistics and room and board tax
10/17/2016	Erin E. Lyons	0.50	Preliminary conversations about trial exhibits

May 19, 2017
Page 25

10/18/2016	Gordon D. Todd	0.50	Work on trial preparation including assessing technology available in courtroom and strategizing regarding possible exhibits
10/18/2016	Benjamin Beaton	0.20	Telephone conference with J. Guynn regarding continuance
10/18/2016	Benjamin Beaton	0.10	Review reconsideration research from D. Hay
10/18/2016	Benjamin Beaton	0.30	Office conference with D. Hay, M. Branch, G. Todd regarding motions practice
10/18/2016	Benjamin Beaton	0.30	Emails with Sidley team regarding trial prep
10/18/2016	Robin Wright	0.80	Research for motion to exclude gun
10/18/2016	Erin E. Lyons	2.00	Call with A. Ferguson and internal conversations regarding courtroom visit and trial logistics
10/19/2016	Gordon D. Todd	0.30	Call with A. Smith regarding courtroom layout
10/19/2016	Benjamin Beaton	0.30	Office conference with G. Todd, M. Branch regarding courtroom setup and trial prep
10/19/2016	Erin E. Lyons	0.50	Conversations with River North regarding transfer order and room and board tax
10/19/2016	Erin E. Lyons	0.50	Continue to work on trial accommodations
10/20/2016	Benjamin Beaton	0.50	Revise continuance motion
10/20/2016	Benjamin Beaton	0.30	Telephone conferences with J. Guynn, G. Todd regarding motion for continuance
10/20/2016	Benjamin Beaton	0.10	Email with Sidley team regarding continuance motion and trial prep
10/20/2016	Morgan Branch	3.00	Research and draft motion in limine to exclude gun-related evidence
10/20/2016	Morgan Branch	1.50	Draft exhibit designations
10/20/2016	Morgan Branch	2.50	Review discovery from commonwealth attorneys offices and Danville police department
10/20/2016	Erin E. Lyons	0.50	Coordinate with lawyers travel regarding guest room accommodations
10/21/2016	Benjamin Beaton	0.30	Confer with J. Guynn and magistrate chambers regarding scheduling issues
10/21/2016	Benjamin Beaton	0.30	Telephone conference with J. Guynn regarding continuance
10/21/2016	Benjamin Beaton	0.20	Work on scheduling issues for trial
10/21/2016	Morgan Branch	4.50	Review follow-up use of force complaint files, track complaints, and draft email to team regarding findings
10/22/2016	Daniel J. Hay	3.80	Research and draft motion in limine
10/23/2016	Daniel J. Hay	3.40	Research and draft one pager on past use of force complaints
10/23/2016	Daniel J. Hay	1.80	Research and draft motion in limine
10/24/2016	Benjamin Beaton	0.10	Confer with M. Branch regarding motions practice
10/24/2016	Benjamin Beaton	0.30	Office conference with M. Branch regarding trial prep
10/24/2016	Benjamin Beaton	0.10	Emails with Sidley team regarding trial prep
10/24/2016	Robin Wright	0.50	Draft jury instructions
10/24/2016	Robin Wright	0.60	Review notes from pretrial strategy meeting to compose list of questions for W. Wallace
10/24/2016	Robin Wright	0.40	Draft email to Roanoke Attorney RE advice for trial
10/24/2016	Daniel J. Hay	4.80	Research and draft motion in limine
10/24/2016	Daniel J. Hay	2.60	Edit and finalize 404(b) MIL and one-pager
10/24/2016	Morgan Branch	8.50	Research and draft Motion in limine
10/24/2016	Morgan Branch	6.80	Review documents and draft exhibit designations for trial
10/24/2016	Daniel J. Hay	1.10	Research and draft one-pager related to admissibility of past UOF complaints
10/25/2016	Benjamin Beaton	0.40	Confer with G. Todd regarding scheduling response and Wershba errata
10/25/2016	Benjamin Beaton	0.10	Office conference with M. Branch regarding motions practice
10/25/2016	Benjamin Beaton	0.30	Respond to Court's scheduling inquiry
10/25/2016	Robin Wright	1.00	Follow-up research for motion to exclude gun
10/25/2016	Robin Wright	0.30	Correspond with M. Branch about research for mot. To exclude gun

May 19, 2017
Page 26

10/25/2016	Daniel J. Hay	1.30	Research procedure for objecting to expert errata sheet
10/25/2016	Daniel J. Hay	0.40	Research related to upcoming motions
10/25/2016	Morgan Branch Cara R. Viglucci	4.80	Research and draft Motion in limine
10/26/2016	Lopez	0.40	Work on expert logistics
10/26/2016	Benjamin Beaton	0.10	Work on trial scheduling
10/26/2016	Morgan Branch	1.00	Communicate with team and opposing counsel regarding trial date Coordinate with court reporting company to obtain copies of deposition exhibits
10/26/2016	Erin E. Lyons	0.50	
10/27/2016	Erin E. Lyons	0.50	Process and send request for payment related to medical expert
10/28/2016	Benjamin Beaton	0.10	Email with Sidley team regarding motions practice
10/28/2016	Erin E. Lyons	0.50	Review deposition errata sheets
10/31/2016	Benjamin Beaton	0.20	Office conference with G. Todd regarding trial prep
10/31/2016	Robin Wright	2.10	Draft jury instructions
11/1/2016	Benjamin Beaton	0.20	Taylor witness preparation
11/1/2016	Benjamin Beaton	0.30	Office conference with G. Todd, M. Branch regarding hearing request
11/1/2016	Benjamin Beaton	0.20	Confer with D. Hay, M. Branch regarding motions practice Meeting with R. Wright, M. Branch, D. Hay regarding post-continuance trial prep
11/1/2016	Benjamin Beaton	1.20	
11/1/2016	Robin Wright	1.00	Coordination meeting because of continuance of trial
11/1/2016	Daniel J. Hay	1.10	Meet to discuss pretrial matters (1.1) Change hotel reservations in light of rescheduled trial; review and download recent filing by defense counsel
11/1/2016	Erin E. Lyons	1.00	
11/2/2016	Erin E. Lyons	0.50	Reschedule hotel reservations for new trial date
11/2/2016	Erin E. Lyons	0.50	Reschedule legal call with client
11/4/2016	Benjamin Beaton	0.30	Office conference with M. Branch regarding motions practice
11/4/2016	Benjamin Beaton	0.10	Telephone conference with D. Hay regarding privilege argument
11/6/2016	Benjamin Beaton	0.90	Revise reconsideration motion reply
11/7/2016	Benjamin Beaton	3.80	Revise Taylor reconsideration motion
11/7/2016	Benjamin Beaton	0.20	Revise reply brief
11/7/2016	Robin Wright	0.80	Draft jury instructions
11/7/2016	Erin E. Lyons	0.50	Reschedule case management meetings
11/8/2016	Benjamin Beaton	1.50	Revise reply brief
11/8/2016	Benjamin Beaton	0.20	Confer with Sidley team regarding trial prep Office conference with M. Branch, G. Todd regarding motions and supplemental discovery
11/10/2016	Benjamin Beaton	0.20	
11/10/2016	Robin Wright	1.20	Draft jury instructions
11/10/2016	Erin E. Lyons	0.50	Review and send copies of recent filings to case team
11/11/2016	Robin Wright	1.40	Draft jury instructions
11/11/2016	Morgan Branch	1.50	Draft motion to exclude gun-related evidence
11/13/2016	Morgan Branch	2.00	Continue to draft motion to exclude gun-related evidence
11/14/2016	Gordon D. Todd	0.70	Case management meeting
11/14/2016	Benjamin Beaton	0.60	Sidley team meeting regarding discovery and pretrial briefing
11/14/2016	Robin Wright	0.50	Trial coordination meeting
11/14/2016	Daniel J. Hay	0.50	Wyatt team meeting
11/14/2016	Morgan Branch	0.50	Team meeting
11/14/2016	Morgan Branch	12.00	Draft motion to exclude gun-related evidence
11/16/2016	Benjamin Beaton	2.50	Revise motions in limine
11/17/2016	Benjamin Beaton	0.10	Office conference with M. Branch regarding draft motion

May 19, 2017

Page 27

11/17/2016	Daniel J. Hay	1.10	Review and edit motion in limine
11/18/2016	Benjamin Beaton	0.30	Call with M. Branch, G. Todd regarding supplemental discovery
11/18/2016	Benjamin Beaton	0.20	Revise discovery correspondence
11/18/2016	Morgan Branch	1.00	Draft email to opposing counsel regarding clean-up discovery
11/21/2016	Benjamin Beaton	0.60	Work on supplemental discovery demand
11/22/2016	Benjamin Beaton	0.20	Email regarding supplemental discovery and mediation dates
11/22/2016	Benjamin Beaton	0.50	Work on supplemental discovery demand
11/22/2016	Daniel J. Hay	2.40	Research and draft motion to depose M. Young
11/22/2016	Morgan Branch	2.00	Draft motion to depose M. Young
11/22/2016	Morgan Branch	1.50	Draft and revise email to opposing counsel regarding discovery follow-up
11/23/2016	Benjamin Beaton	0.20	Confer with M. Branch regarding discovery correspondence
11/23/2016	Daniel J. Hay	0.50	Revise motion to depose M. Young
11/23/2016	Morgan Branch	3.00	Draft motion to depose M. Young
11/24/2016	Benjamin Beaton	0.60	Revise motion to depose M. Young
11/27/2016	Benjamin Beaton	0.20	Confer with Sidley team regarding mediation and supplemental discovery
11/27/2016	Daniel J. Hay	3.20	Research and revise motion to depose M. Young
11/28/2016	Benjamin Beaton	1.30	Revise brief
11/28/2016	Benjamin Beaton	1.20	Revise motion
11/28/2016	Benjamin Beaton	0.10	Email with M. Branch, D. Hay regarding discovery motion
11/28/2016	Daniel J. Hay	2.10	Research and revise motion to depose M. Young
11/28/2016	Daniel J. Hay	0.60	Meet with M. Branch to discuss motion to depose M. Young
11/28/2016	Morgan Branch	6.00	Research and revise motion to depose M. Young
11/29/2016	Benjamin Beaton	0.20	Office conference with M. Branch regarding motions
11/29/2016	Benjamin Beaton	1.80	Revise discovery motion
			Revise motion to depose M. Young based on edits from B. Beaton and M. Branch (.7); meet with M. Branch regarding the same (.5)
11/29/2016	Daniel J. Hay	1.20	
11/29/2016	Morgan Branch	3.00	Revise motion to take deposition of M. Young
11/29/2016	Erin E. Lyons	1.00	Review deposition transcripts and draft associated deposition notices
			Review and revise draft motion to compel additional depositions in light of late production
11/30/2016	Gordon D. Todd	1.00	
11/30/2016	Benjamin Beaton	0.20	Office conference with M. Branch regarding motion
11/30/2016	Benjamin Beaton	0.30	Work on supplemental discovery
11/30/2016	Benjamin Beaton	0.10	Telephone conference with D. Hay regarding discovery requests
11/30/2016	Daniel J. Hay	0.20	Review B. Beaton's revisions to motion to depose M. Young
			Communicate with trial team and share key use of force complaint files for motion to reopen
11/30/2016	Morgan Branch	2.00	
11/30/2016	Erin E. Lyons	0.50	Pull and compile requested documents
12/1/2016	Benjamin Beaton	0.20	Mediation prep
12/1/2016	Daniel J. Hay	1.80	Revise motion to depose M. Young
12/1/2016	Morgan Branch	1.00	Revise motion to take deposition of M. Young
12/5/2016	Benjamin Beaton	1.00	Mediation prep
12/5/2016	Benjamin Beaton	0.50	Revise discovery motion
12/5/2016	Benjamin Beaton	1.30	Revise mediation statement and discovery motion
12/5/2016	Robin Wright	0.30	Review of order regarding mediation
12/5/2016	Daniel J. Hay	0.60	Meet to discuss mediation statement
12/5/2016	Daniel J. Hay	0.60	Draft mediation statement
12/5/2016	Morgan Branch	1.00	Team meeting; Damages research
12/5/2016	Erin E. Lyons	0.50	Coordinate legal calls with client
12/6/2016	Benjamin Beaton	0.50	Revise mediation statement

May 19, 2017
Page 28

12/6/2016	Daniel J. Hay	1.20	Draft and revise mediation statement
12/6/2016	Morgan Branch	7.50	Draft mediation statement
12/6/2016	Erin E. Lyons	4.50	Research damages awards
12/7/2016	Gordon D. Todd	0.40	Call with M. Wyatt regarding mediation process
12/7/2016	Gordon D. Todd	1.00	Review and revise motion to depose Young
12/7/2016	Gordon D. Todd	1.20	Review and revise draft mediation statement
12/7/2016	Benjamin Beaton	2.00	Revise mediation statement
12/7/2016	Benjamin Beaton	0.40	Telephone conference with M. Wyatt regarding mediation
12/7/2016	Benjamin Beaton	0.30	Mediation prep
12/7/2016	Robin Wright	0.50	Research use of Graham factors in jury instructions
12/7/2016	Daniel J. Hay	1.30	Revise mediation statement
12/7/2016	Morgan Branch	0.50	Call with client
12/8/2016	Benjamin Beaton	0.20	Edit mediation statement
12/8/2016	Daniel J. Hay	1.80	Comments on mediation statement
12/8/2016	Morgan Branch	2.20	Revise mediation statement
12/8/2016	Erin E. Lyons	0.50	Compile exhibits to accompany mediation statement
12/9/2016	Gordon D. Todd	4.00	Prepare for mediation
12/9/2016	Gordon D. Todd	1.00	Prepare for and participate in mediation pre-call with MJ Balou
12/9/2016	Benjamin Beaton	0.20	Mediation call prep
12/9/2016	Benjamin Beaton	0.80	Call with magistrate judge in advance of mediation
12/9/2016	Daniel J. Hay	3.30	Research matters related to attorney fee request under 42 USC 1988
12/9/2016	Daniel J. Hay	0.60	Research matters relating to and prepare materials for mediation
12/9/2016	Morgan Branch	0.80	Mediation call with Judge Ballou
12/9/2016	Erin E. Lyons	1.50	Create mediation prep binders
12/10/2016	Gordon D. Todd	1.00	Prepare for mediation
12/10/2016	Daniel J. Hay	0.70	Research whether a private settlement confers prevailing party status
12/11/2016	Gordon D. Todd	3.00	Prepare for mediation
12/12/2016	Gordon D. Todd	10.00	Participate in Mediation
12/12/2016	Benjamin Beaton	5.50	Participate in Mediation
12/12/2016	Benjamin Beaton	5.00	Prep for mediation during travel to Roanoke
12/12/2016	Daniel J. Hay	0.70	Research applicability of punitive damages cap in 1983 case; draft email to B. Beaton concerning the same
12/12/2016	Morgan Branch	11.00	Mediation in Roanoke, VA
12/12/2016	Daniel J. Hay	1.10	Research admissibility of subsequent conviction
12/15/2016	Benjamin Beaton	1.10	Revise motion to depose Young
12/15/2016	Morgan Branch	2.00	Revise motion to take deposition of M. Young
12/15/2016	Erin E. Lyons	0.50	Prepare exhibits to accompany filing
12/20/2016	Benjamin Beaton	0.20	Confer with Sidley team regarding discovery motion
12/20/2016	Erin E. Lyons	0.50	Attempt to schedule a legal call with client and related internal communication
1/3/2017	Erin E. Lyons	0.50	Coordinate legal call with client
1/4/2017	Morgan Branch	0.30	Call with M. Wyatt
1/4/2017	Erin E. Lyons	0.50	Legal call with client
1/7/2017	Daniel J. Hay	1.00	Draft reply
1/7/2017	Daniel J. Hay	0.40	Call with M. Branch to discuss reply
1/7/2017	Morgan Branch	3.80	Draft reply to Opposition to motion to take supplemental discovery
1/8/2017	Benjamin Beaton	2.10	Revise reply brief
1/9/2017	Gordon D. Todd	0.40	Review reply brief in support of motion for deposition
1/9/2017	Benjamin Beaton	0.50	Revise reply brief

May 19, 2017

Page 29

1/9/2017	Benjamin Beaton	0.10	Office conference with M. Branch regarding reply
1/9/2017	Daniel J. Hay	0.90	Revise reply (motion to depose M. Young)
1/9/2017	Morgan Branch	0.30	Review reply to opposition to discovery and circulate revision
1/10/2017	Morgan Branch	0.50	Review and file reply to Opposition
1/18/2017	Erin E. Lyons	0.50	Correspond with trial consultant
1/19/2017	Erin E. Lyons	0.50	Internal coordination associated with bi-weekly case team meetings
1/23/2017	Gordon D. Todd	0.70	Team meeting
1/23/2017	Benjamin Beaton	0.80	Team meeting regarding discovery and trial prep
1/23/2017	Benjamin Beaton	0.10	Office conference with D. Hay regarding motion in limine
1/23/2017	Robin Wright	0.80	Trial preparation meeting
1/23/2017	Daniel J. Hay	0.70	Wyatt team meeting
1/23/2017	Morgan Branch	0.50	Trial team meeting
1/24/2017	Benjamin Beaton	0.50	Office conference with M. Branch regarding trial prep
1/24/2017	Erin E. Lyons	0.50	Update trial prep chart
1/25/2017	Erin E. Lyons	0.50	Update trial prep chart with new deadlines
1/27/2017	Daniel J. Hay	2.00	Revise motion in limine to exclude past bad acts
1/27/2017	Erin E. Lyons	0.50	Process trial consulting agreement and request for payment
1/29/2017	Morgan Branch	9.00	Revise gun-related discovery motion
1/30/2017	Benjamin Beaton	1.00	Revise motions in limine
1/30/2017	Benjamin Beaton	0.10	Revise withdrawal motion
1/30/2017	Daniel J. Hay	1.00	Review and edit motion in limine to exclude gun evidence
1/30/2017	Daniel J. Hay	0.20	Revise motion in limine to exclude past crimes
1/30/2017	Morgan Branch	1.50	Revise discovery gun-related motion
1/30/2017	Erin E. Lyons	0.50	Prepare, edit and file Motion to Withdraw for C. Viglucci Lopez
1/30/2017	Erin E. Lyons	0.50	Locate discovery responses from Worsham and Nicholson
1/31/2017	Benjamin Beaton	1.30	Revise motion in limine
1/31/2017	Daniel J. Hay	1.60	Revise motion in limine to exclude past acts
1/31/2017	Erin E. Lyons	0.50	Internal communication associated with discovery responses from defendants
2/1/2017	Benjamin Beaton	0.10	Confer with M. Branch regarding motion in limine
2/1/2017	Daniel J. Hay	1.10	Revise motion to exclude past crimes
2/1/2017	Morgan Branch	4.80	Revise discovery gun-related motion
2/2/2017	Morgan Branch	0.50	Call with D. Greenfield
2/2/2017	Erin E. Lyons	0.50	Review and compile filings for Section 1983 database
2/3/2017	Robin Wright	0.80	Revise jury instructions to include Graham factors and excessive force instructions from different circuits
2/6/2017	Benjamin Beaton	0.10	Office conference with M. Branch regarding motion in limine
2/6/2017	Robin Wright	0.50	Review jury instructions
2/6/2017	Erin E. Lyons	1.50	Locate and pull exhibits for binders
2/7/2017	Erin E. Lyons	1.50	Locate and pull exhibits for binders
2/9/2017	Gordon D. Todd	3.00	Review and revise motion in limine regarding gun
2/12/2017	Daniel J. Hay	0.30	Draft email to B. Beaton concerning motions in limine
2/20/2017	Gordon D. Todd	0.50	Team strategy meeting
2/20/2017	Benjamin Beaton	1.00	Revise motion in limine
2/20/2017	Benjamin Beaton	0.80	Office conference with Sidley team regarding trial prep
2/20/2017	Daniel J. Hay	0.90	Meeting with G. Todd, B. Beaton, and M. Branch to discuss trial strategy and logistics
2/20/2017	Morgan Branch	1.00	Team meeting
2/20/2017	Erin E. Lyons	2.50	Case team discussion; update task list and revise potential trial exhibits

May 19, 2017

Page 30

2/21/2017	Benjamin Beaton	0.40	Revise motion in limine
2/21/2017	Daniel J. Hay	1.00	Revise motion in limine and send to G. Todd for approval
2/21/2017	Morgan Branch	2.00	Revise gun motion
2/21/2017	Erin E. Lyons	1.50	Review, edit and finalize potential exhibits for production
2/22/2017	Benjamin Beaton	0.10	Arrange Young deposition
2/22/2017	Benjamin Beaton	0.10	Confer with opposing counsel regarding deposition scheduling
2/22/2017	Benjamin Beaton	2.90	Revise motion in limine
2/22/2017	Benjamin Beaton	0.10	Email with Sidley team regarding discovery ruling
2/22/2017	Daniel J. Hay	0.30	Review and revise motion in limine to exclude handgun evidence
2/22/2017	Erin E. Lyons	1.50	Research Michael Young and attempt to locate local process server
2/23/2017	Gordon D. Todd	0.30	Confer with B. Beaton regarding Young deposition
2/23/2017	Benjamin Beaton	0.30	Email to team regarding witness conversations
2/23/2017	Benjamin Beaton	0.60	Telephone conference with M. Young regarding deposition
2/23/2017	Benjamin Beaton	0.20	Deposition prep for M. Young
2/24/2017	Gordon D. Todd	0.20	Review order regarding Young deposition
2/24/2017	Gordon D. Todd	1.20	Review and revise draft motion in limine to exclude gun evidence
2/24/2017	Gordon D. Todd	0.80	Review and revise draft motion to exclude evidence of prior bad acts
2/24/2017	Benjamin Beaton	0.10	Prep for M. Young deposition
2/24/2017	Benjamin Beaton	0.10	Telephone conference with M. Young regarding deposition scheduling
2/24/2017	Daniel J. Hay	0.50	Prepare final copy of prior conduct motion
2/24/2017	Erin E. Lyons	0.50	Internal communication associated with trial consultant and exhibits to accompany motion in limine
2/24/2017	Erin E. Lyons	0.50	Locate court report and videographer for M. Young deposition and related internal communication
2/25/2017	Gordon D. Todd	3.00	Review trial exhibits
2/26/2017	Gordon D. Todd	6.00	Review trial exhibits
2/27/2017	Gordon D. Todd	5.00	Continue to review trial exhibits
2/27/2017	Benjamin Beaton	0.20	Correspond with opposing counsel regarding deposition scheduling
2/27/2017	Erin E. Lyons	1.00	Prepare exhibits
2/28/2017	Gordon D. Todd	4.00	Work on Worsham cross examination
2/28/2017	Benjamin Beaton	0.10	Office conference with M. Branch regarding trial prep
2/28/2017	Benjamin Beaton	2.20	Revise and proof outline
2/28/2017	Morgan Branch	1.00	Revise and circulate gun motion
2/28/2017	Erin E. Lyons	0.50	Communicate with court reporter regarding upcoming deposition scheduling and related logistics
3/1/2017	Gordon D. Todd	0.30	Further revisions to gun MIL
3/1/2017	Gordon D. Todd	8.00	Continue to work on Worsham CX
3/1/2017	Benjamin Beaton	0.50	Telephone conference with J. Guynn
3/1/2017	Benjamin Beaton	0.40	Revise proof outline
3/1/2017	Benjamin Beaton	0.30	Office conference with D. Hay regarding damages research
3/1/2017	Benjamin Beaton	0.10	Draft deposition notice
3/1/2017	Benjamin Beaton	0.40	Confer with R. Wright, M. Branch regarding deposition and trial prep
3/1/2017	Benjamin Beaton	0.20	Office conferences with E. Lyons, D. Hay regarding deposition and trial prep
3/1/2017	Benjamin Beaton	0.30	Confer with Sidley team regarding pretrial submissions
3/1/2017	Daniel J. Hay	0.40	Meet with B. Beaton to discuss punitive damages research
3/1/2017	Morgan Branch	1.00	Revise gun motion and finalize exhibits
3/1/2017	Erin E. Lyons	1.50	Secure court reporter and videographer, draft, revise and send deposition notice and accompanying exhibit

May 19, 2017
Page 31

3/1/2017	Erin E. Lyons	3.00	Review, cite check and edit Motion in Limine and compile accompanying exhibits
3/1/2017	Erin E. Lyons	0.50	Social media captures and online articles
3/2/2017	Gordon D. Todd	1.00	Continue to work on Worsham CX
3/2/2017	Benjamin Beaton	0.20	Office conference with M. Branch regarding exhibits and deposition prep
3/2/2017	Daniel J. Hay	3.60	Research evidentiary questions related to punitive damages
3/2/2017	Morgan Branch	1.00	Review, finalize, and file gun motion
3/2/2017	Erin E. Lyons	1.50	Revise and edit motion and limine and accompanying exhibits
3/2/2017	Erin E. Lyons	1.00	Preliminary call with Opveon and related follow up
3/3/2017	Gordon D. Todd	4.00	Continue to work on Worsham cross
3/3/2017	Benjamin Beaton	0.10	Office conference with G. Todd regarding trial prep
3/3/2017	Erin E. Lyons	1.50	Upload content in preparation for trial
3/5/2017	Gordon D. Todd	4.00	Continue to work on trial preparation
3/6/2017	Gordon D. Todd	4.00	Continue to work on trial preparation
3/6/2017	Benjamin Beaton	0.70	Team meeting regarding trial prep
3/6/2017	Robin Wright	2.00	Updating footnotes in proof outline
3/6/2017	Robin Wright	0.70	Trial preparation meeting
3/6/2017	Daniel J. Hay	0.70	Meet with B. Beaton, M. Branch, R. Wright, and E. Lyons to discuss case status
3/6/2017	Daniel J. Hay	0.60	Review trial exhibits relevant to past use of force complaints to prepare for Young deposition
3/6/2017	Morgan Branch	2.00	Revise trial proof chart and meet with team
3/6/2017	Erin E. Lyons	2.00	Case team meeting and related follow up
3/6/2017	Erin E. Lyons	1.50	Run searches and review select documents in Relativity in preparation for M. Young deposition
3/6/2017	Erin E. Lyons	1.00	Preparation of materials for M. Young deposition
3/7/2017	Benjamin Beaton	2.10	Research proof elements and outline proof chart
3/7/2017	Benjamin Beaton	0.80	Review Young documents in preparation for deposition
3/7/2017	Benjamin Beaton	0.20	Work on Young prep
3/7/2017	Benjamin Beaton	0.50	Confer with Clerk and Sidley team regarding trial logistics
3/7/2017	Benjamin Beaton	0.10	Work on exhibit list
3/7/2017	Daniel J. Hay	1.00	Research 1983 bystander liability
3/7/2017	Morgan Branch	2.00	Finalize proposed exhibits
3/7/2017	Erin E. Lyons	0.50	Revise and update case calendar
3/7/2017	Erin E. Lyons	1.00	Search DPD emails in relation to M. Young deposition
3/7/2017	Erin E. Lyons	0.50	Calls with VDOC regarding transport/transfer order
3/7/2017	Erin E. Lyons	0.50	Attend to trial logistics
3/7/2017	Erin E. Lyons	0.50	Conversation with Lit Support regarding trial needs
3/8/2017	Gordon D. Todd	7.00	Trial strategy and exhibits conference with B. Beaton and M. Branch
3/8/2017	Benjamin Beaton	0.20	Work on outline for Young deposition and motion for transport
3/8/2017	Benjamin Beaton	0.50	Revise motion to transport
3/8/2017	Benjamin Beaton	6.40	Meet with G. Todd and M. Branch regarding trial prep and exhibits
3/8/2017	Benjamin Beaton	0.40	Telephone conference with J. Guynn regarding pretrial scheduling
3/8/2017	Benjamin Beaton	0.20	Email with local counsel regarding scheduling matters
3/8/2017	Daniel J. Hay	0.40	Review use of force complaint file exhibits to prepare for M. Young deposition
3/8/2017	Morgan Branch	6.00	Team trial exhibit, witness examination, and strategy review
3/8/2017	Erin E. Lyons	0.50	Follow up with River North Correctional regarding medical records certification

May 19, 2017
Page 32

3/8/2017	Erin E. Lyons	2.50	Conversations with VDOC and T. Taylor regarding transport and transfer motion and order; draft preliminary motion and proposed order
3/9/2017	Gordon D. Todd	5.00	Continue Worsham examination
3/9/2017	Benjamin Beaton	1.40	Research punitive damages
3/9/2017	Benjamin Beaton	0.10	Telephone conference with court clerk
3/9/2017	Benjamin Beaton	0.30	Prep for Young deposition
3/9/2017	Benjamin Beaton	0.80	Office conference with D. Hay and R. Wright regarding Young deposition and Taylor outline
3/9/2017	Benjamin Beaton	1.40	Work on trial prep
3/9/2017	Benjamin Beaton	0.80	Schedule pretrial hearing with J. Guynn, court clerk, and Sidley team
3/9/2017	Benjamin Beaton	0.40	Office conference with M. Branch regarding trial prep
3/9/2017	Benjamin Beaton	0.20	Office conference with G. Todd regarding trial prep
3/9/2017	Robin Wright	0.60	Meeting about trial preparation
3/9/2017	Daniel J. Hay	4.30	Draft outline for deposition of M. Young
3/9/2017	Morgan Branch	0.30	Meet with E. Lyons
3/9/2017	Morgan Branch	1.00	Revise exhibit list
3/9/2017	Erin E. Lyons	1.50	Review and confirm calendaring and upcoming deadlines and review FRCP, local rules and orders
3/9/2017	Erin E. Lyons	0.50	Compile medical records and related expert materials
3/9/2017	Erin E. Lyons	1.00	Meet and discuss changes to trial exhibits; compile updated exhibits
3/9/2017	Erin E. Lyons	1.00	Communication and planning associated with trial war room needs
3/10/2017	Gordon D. Todd	2.00	Continue trial preparations
3/10/2017	Benjamin Beaton	1.20	Prep for Young deposition
3/10/2017	Benjamin Beaton	0.20	Telephone conference with M. Young regarding deposition
3/10/2017	Daniel J. Hay	2.10	Prepare exhibits for M. Young deposition
3/10/2017	Daniel J. Hay	1.00	Revise deposition outline for M. Young
3/10/2017	Daniel J. Hay	0.60	Meet with B. Beaton to discuss M. Young deposition outline
3/10/2017	Morgan Branch	1.50	Revise exhibit list
3/10/2017	Morgan Branch	1.50	Trial preparation including examination drafting and exhibit review
3/10/2017	Erin E. Lyons	1.00	Calls to VDOC regarding legal call with client and required certifications
3/10/2017	Erin E. Lyons	1.50	Prepare materials for upcoming deposition
3/10/2017	Erin E. Lyons	0.50	Discussion with T. Shim regarding trial logistics and needs
3/11/2017	Gordon D. Todd	10.00	Trial preparation including working on examinations and exhibit review
3/11/2017	Benjamin Beaton	2.80	Prep for Young deposition
3/11/2017	Daniel J. Hay	0.90	Research admissibility of citizen complaint files
3/11/2017	Daniel J. Hay	1.90	Prepare for M. Young deposition
3/11/2017	Daniel J. Hay	0.70	Reviewed defendants' deposition transcripts concerning beating in preparation for M. Young deposition
3/11/2017	Morgan Branch	2.00	Trial preparation
3/12/2017	Benjamin Beaton	2.40	Young deposition prep
3/12/2017	Robin Wright	0.30	Research petition for writ of habeas corpus ad testificandum
3/12/2017	Daniel J. Hay	4.30	Prepare materials and outline for deposition of M. Young
3/12/2017	Daniel J. Hay	1.20	Research evidentiary matters relating to deposition of M. Young
3/12/2017	Daniel J. Hay	0.80	Revise outline for deposition of M. Young
3/13/2017	Benjamin Beaton	5.30	Conduct Young deposition
3/13/2017	Benjamin Beaton	3.80	Prep for Young deposition during travel from DC to Lynchburg
3/13/2017	Benjamin Beaton	3.30	Review Young testimony and case strategy during travel from Lynchburg to DC after Young deposition
3/13/2017	Daniel J. Hay	6.20	Attend deposition of M. Young

May 19, 2017
Page 33

3/13/2017	Erin E. Lyons	2.50	Follow up with entities regarding necessary certifications; coordinate with case team regarding transfer and transport; review and update exhibits
3/14/2017	Gordon D. Todd	2.00	Review law of punitive damages evidence
3/14/2017	Benjamin Beaton	1.70	Work on trial themes and legal research on admissibility
3/14/2017	Benjamin Beaton	0.30	Work on trial prep
3/14/2017	Benjamin Beaton	0.30	Revise discovery request
3/14/2017	Robin Wright	1.30	Review Taylor deposition
3/14/2017	Robin Wright	3.00	Draft petition for writ of habeas corpus ad testificandum
3/14/2017	Daniel J. Hay	0.50	Draft emails concerning punitive damages research
3/14/2017	Daniel J. Hay	4.60	Review deposition of T. Nicholson and accompanying exhibits
3/14/2017	Morgan Branch	1.00	Revise exhibit list and trial prep chart
3/14/2017	Erin E. Lyons	0.50	Multiple attempts to coordinate legal call with client
3/14/2017	Erin E. Lyons	0.50	Internal communication associated with transfer and transport issues
3/14/2017	Erin E. Lyons	0.50	Review and compile medical records and related documentation for expert review and production to defense counsel
3/14/2017	Erin E. Lyons	0.50	Review and upload M. Young deposition exhibits
3/14/2017	Erin E. Lyons	2.00	Coordinate with Danville City Sheriff's Office, Wallens Ridge and River North regarding required certifications; review and edit certifications as appropriate
3/14/2017	Erin E. Lyons	0.50	Conversation with Lit Support regarding war room needs and other trial related logistics
3/15/2017	Gordon D. Todd	1.00	Confer with B. Beaton, M. Branch, T. Green regarding trial prep
3/15/2017	Gordon D. Todd	0.50	Call with local practitioner regarding intel on trial conventions
3/15/2017	Benjamin Beaton	1.60	Work on trial prep and revised transport motion
3/15/2017	Benjamin Beaton	1.40	Office conference with T. Green regarding trial prep
3/15/2017	Benjamin Beaton	0.60	Telephone conference with local practitioner regarding trial prep
3/15/2017	Robin Wright	1.30	Review Taylor deposition
3/15/2017	Daniel J. Hay	4.00	Draft direct examination outline for T. Nicholson
3/15/2017	Daniel J. Hay	0.50	Review interrogatory responses of T. Nicholson
3/15/2017	Morgan Branch	4.00	Trial preparation
3/15/2017	Morgan Branch	2.00	Meeting with T. Green, G. Todd, and B. Beaton regarding trial strategy
3/15/2017	Erin E. Lyons	1.00	Follow up on certification requests
3/15/2017	Erin E. Lyons	0.50	Coordinate legal call with client
3/16/2017	Gordon D. Todd	2.00	Trial prep
3/16/2017	Benjamin Beaton	0.50	Office conference with M. Letten regarding punitive research
3/16/2017	Benjamin Beaton	0.40	Work on trial prep
3/16/2017	Benjamin Beaton	0.20	Office conference with M. Branch regarding trial prep
3/16/2017	Robin Wright	1.40	Review Taylor deposition
3/16/2017	Robin Wright	0.70	Research for petition for writ of habeas corpus ad testificandum
3/16/2017	Daniel J. Hay	0.40	Draft email to M. Letten concerning punitive damages research
3/16/2017	Morgan Branch	3.00	Trial preparation
3/16/2017	Erin E. Lyons	0.50	Prepare documentation for upcoming legal call
3/16/2017	Erin E. Lyons	0.50	Internal communication associated with transport order
3/17/2017	Benjamin Beaton	0.40	Work on motion and pretrial disclosures
3/17/2017	Benjamin Beaton	0.30	Telephone conference with client regarding trial prep
3/17/2017	Benjamin Beaton	0.10	Confer with opposing counsel regarding pretrial exchange scheduling
3/17/2017	Daniel J. Hay	6.20	Draft outline of direct examination of T. Nicholson
3/17/2017	Morgan Branch	1.50	Trial preparation
3/17/2017	Erin E. Lyons	0.50	Create link for sharing of medical documentation

May 19, 2017

Page 34

3/17/2017	Erin E. Lyons	0.50	Legal call with client and related follow up
3/17/2017	Erin E. Lyons	1.00	Prepare trial subpoenas
			Draft proposed order and writ for petition for writ of habeas corpus ad
			testificandum
3/18/2017	Robin Wright	1.50	
3/18/2017	Daniel J. Hay	0.90	Review jail calls concerning discovery of the gun
3/19/2017	Gordon D. Todd	4.00	Review S. Wyatt deposition
3/19/2017	Benjamin Beaton	0.20	Email regarding trial prep
			Draft proposed order and writ for petition for writ of habeas corpus ad
			testificandum
3/19/2017	Robin Wright	0.20	
3/19/2017	Daniel J. Hay	0.20	Review and revise prior acts motion in limine
3/19/2017	Morgan Branch	3.00	Trial preparation
3/20/2017	Gordon D. Todd	1.00	Team strategy meeting
3/20/2017	Benjamin Beaton	0.30	Revise motion in limine
3/20/2017	Benjamin Beaton	1.00	Team meeting regarding trial prep
3/20/2017	Benjamin Beaton	0.30	Revise Nicholson outline
3/20/2017	Benjamin Beaton	0.20	Office conference with M. Branch, D. Hay regarding trial prep
3/20/2017	Robin Wright	2.40	Draft Taylor cross examination outline
3/20/2017	Robin Wright	1.00	Trial preparation meeting
			Meet with G. Todd, B. Beaton, M. Branch, and R. Wright to discuss case
			strategy
3/20/2017	Daniel J. Hay	1.10	
3/20/2017	Daniel J. Hay	3.90	Draft reply in support of motion in limine (gun)
3/20/2017	Daniel J. Hay	1.10	Revise motion in limine (past bad acts)
3/20/2017	Daniel J. Hay	0.30	Draft email concerning potential motion in limine
3/20/2017	Daniel J. Hay	0.20	Meet with B. Beaton to discuss motions in limine
3/20/2017	Morgan Branch	1.00	Team meeting
3/20/2017	Morgan Branch	11.70	Draft witness Direct outline
3/20/2017	Morgan Branch	1.00	Trial preparation
3/20/2017	Morgan Branch	0.50	Call with Trial Graphics
3/20/2017	Erin E. Lyons	0.50	Follow up with court reporter regarding M. Young deposition transcript
3/20/2017	Erin E. Lyons	0.50	Prepare certification for Danville Life Saving
3/21/2017	Gordon D. Todd	4.00	Draft S. Wyatt cross examination
3/21/2017	Daniel J. Hay	0.60	Review use of force production from PCSO
3/21/2017	Daniel J. Hay	0.10	Call with E. Lyons to discuss criminal history
3/21/2017	Daniel J. Hay	2.10	Draft motion in limine (prior convictions section of prior acts motion)
3/21/2017	Daniel J. Hay	0.50	Revise prior acts motion in limine
3/21/2017	Daniel J. Hay	0.30	Meet with M. Branch to discuss second motion in limine
3/21/2017	Daniel J. Hay	0.20	Draft email to B. Beaton to discuss motion in limine (gun)
3/21/2017	Daniel J. Hay	0.30	Identify exhibits for exhibit designation list
3/21/2017	Morgan Branch	6.00	Exhibit designations
3/21/2017	Erin E. Lyons	1.00	Review and revise trial related task list
			Internal communication associated with M. Wyatt's criminal history and
			related records
3/21/2017	Erin E. Lyons	0.50	
3/21/2017	Erin E. Lyons	1.50	Preparation of exhibits and related materials
3/22/2017	Benjamin Beaton	2.70	Revise MIL reply brief
3/22/2017	Benjamin Beaton	1.90	Revise gun reply and exhibit list
3/22/2017	Benjamin Beaton	1.00	Revise pretrial submissions
3/22/2017	Benjamin Beaton	0.40	Meetings on trial exhibits with M. Branch
3/22/2017	Benjamin Beaton	0.30	Trial prep
3/22/2017	Daniel J. Hay	2.30	Revise reply in support of first motion in limine

May 19, 2017

Page 35

3/22/2017	Daniel J. Hay	0.80	Meet with M. Branch and B. Beaton to discuss exhibit designation list
3/22/2017	Morgan Branch	4.00	Draft and refine exhibit list and file with the court
3/22/2017	Morgan Branch	1.00	Draft and refine exhibit list and file with the court
3/22/2017	Erin E. Lyons	3.50	Pull and prepare exhibits; review, edit and file exhibit designations
3/22/2017	Erin E. Lyons	1.00	Coordinate trial related needs
3/23/2017	Gordon D. Todd	0.50	Confer with M. Branch and B. Beaton regarding deposition strategy
3/23/2017	Gordon D. Todd	1.80	Revise gun motion reply brief
3/23/2017	Gordon D. Todd	1.00	Review draft Smith examination
3/23/2017	Benjamin Beaton	0.30	Revise motion in limine
3/23/2017	Benjamin Beaton	0.10	Office conference with G. Todd regarding motion
			Work on pretrial submissions, including corresponding with opposing
			counsel re motion, organize pretrial tasks and assignments, and email team
			re trial-prep calls
3/23/2017	Benjamin Beaton	2.10	
3/23/2017	Benjamin Beaton	1.80	Trial prep
3/23/2017	Benjamin Beaton	0.70	Work on Wyatt trial prep
3/23/2017	Benjamin Beaton	0.70	Call with local counsel regarding local trial practice
3/23/2017	Benjamin Beaton	0.30	Pretrial submissions prep
3/23/2017	Benjamin Beaton	0.30	Office conference with G. Todd, M. Branch regarding trial prep
3/23/2017	Daniel J. Hay	1.50	Revise reply in support of first motion in limine (gun)
3/23/2017	Daniel J. Hay	0.20	Meet with M. Branch to discuss reply in support of motion in limine
3/23/2017	Daniel J. Hay	1.70	Revise petition for habeas corpus ad testificandum
3/23/2017	Morgan Branch	3.00	Revise, finalize, and file reply to gun-related motion
3/23/2017	Morgan Branch	3.00	Trial prep
3/23/2017	Erin E. Lyons	1.00	Create internal task list for trial
3/23/2017	Erin E. Lyons	0.50	Prepare requested exhibits
3/24/2017	Gordon D. Todd	6.00	Work on S. Wyatt cross examination
3/24/2017	Benjamin Beaton	0.10	Trial prep
			Correspond with M Branch about petition for writ of habeas corpus ad
			testificandum
3/24/2017	Robin Wright	0.20	
3/24/2017	Daniel J. Hay	2.70	Review deposition transcript of M. Young
3/24/2017	Daniel J. Hay	0.20	Draft emails concerning transfer order
3/24/2017	Erin E. Lyons	0.50	Coordinate upcoming case team meeting and related follow up
3/25/2017	Gordon D. Todd	2.00	Work on S. Wyatt cross examination
3/25/2017	Benjamin Beaton	0.40	Work on trial and motions prep
3/25/2017	Daniel J. Hay	0.40	Draft email to B. Beaton concerning use of force motion in limine
3/25/2017	Daniel J. Hay	4.40	Draft direct examination outline of M. Young
3/26/2017	Gordon D. Todd	8.00	Work on S. Wyatt cross examination
3/26/2017	Morgan Branch	3.50	Trial Prep
3/27/2017	Gordon D. Todd	4.50	Continue to work on S. Wyatt and R. Worsham cross examination
3/27/2017	Gordon D. Todd	4.00	Work on deposition designations and witness lists
3/27/2017	Gordon D. Todd	1.00	Team strategy and trial prep conference
3/27/2017	Benjamin Beaton	0.10	Office conference with D. Hay regarding use-of-force motion
3/27/2017	Benjamin Beaton	0.20	Confer with opposing counsel regarding pretrial motions
3/27/2017	Benjamin Beaton	3.30	Review transcripts for defendant deposition designations
3/27/2017	Benjamin Beaton	1.50	Team meeting regarding trial prep
3/27/2017	Benjamin Beaton	0.70	Trial prep
3/27/2017	Benjamin Beaton	0.30	Correspond with D. Hay, M. Branch regarding trial prep
3/27/2017	Robin Wright	0.20	Review task list
3/27/2017	Robin Wright	1.50	Trial preparation meeting

May 19, 2017
Page 36

3/27/2017	Daniel J. Hay	1.60	Meet with G. Todd, B. Beaton, M. Branch, R. Wright, and E. Lyons to discuss case status
3/27/2017	Daniel J. Hay	2.30	Draft omnibus motion in limine
3/27/2017	Daniel J. Hay	0.30	Prepare notes on upcoming motions
3/27/2017	Daniel J. Hay	0.30	Call with B. Beaton to discuss upcoming motions in limine
3/27/2017	Daniel J. Hay	0.40	Meet with M. Letten to discuss punitive damages research
3/27/2017	Morgan Branch	4.00	Deposition designations and witness list
3/27/2017	Erin E. Lyons	1.00	Weekly case team meeting
3/27/2017	Erin E. Lyons	3.00	Various tasks associated with witness list and deposition designations
3/28/2017	Gordon D. Todd	0.50	Review habeas motion and witness summaries
3/28/2017	Gordon D. Todd	3.50	Review M. Wyatt deposition
3/28/2017	Benjamin Beaton	0.60	Revise transfer motion
3/28/2017	Benjamin Beaton	0.20	Confer with J. GUynn regarding transfer motion
3/28/2017	Benjamin Beaton	0.90	Work on pretrial prep
3/28/2017	Benjamin Beaton	0.80	Revise Nicholson outline
3/28/2017	Benjamin Beaton	0.40	Revise cross-examination outlines
3/28/2017	Benjamin Beaton	0.40	Telephone conference with M. Young regarding trial testimony
3/28/2017	Robin Wright	1.20	Update transport motion
3/28/2017	Robin Wright	3.30	Review Wershale deposition
3/28/2017	Daniel J. Hay	0.20	Revise petition for writ of habeas corpus ad testificandum
3/28/2017	Morgan Branch	2.00	Trial prep
3/28/2017	Erin E. Lyons	0.50	Communication with case team
3/28/2017	Erin E. Lyons	0.50	Review and file motion for transport
3/28/2017	Erin E. Lyons	1.00	Review and mail trial subpoena to M. Young
3/28/2017	Erin E. Lyons	0.50	Follow up associated with records certifications
3/28/2017	Erin E. Lyons	0.50	Coordinate hotel accommodations for D. Hay
3/29/2017	Gordon D. Todd	5.00	Draft M. Wyatt direct examination
3/29/2017	Benjamin Beaton	0.60	Work on Wershale examination outline
3/29/2017	Benjamin Beaton	0.40	Trial prep
3/29/2017	Daniel J. Hay	4.40	Draft bench brief on prior use of force
3/29/2017	Morgan Branch	1.00	Draft summary of call with civil rights lawyer
3/29/2017	Morgan Branch	1.00	Call with civil rights lawyer
3/29/2017	Erin E. Lyons	2.50	Review deposition transcripts and draft memo regarding R. Simpson
3/29/2017	Erin E. Lyons	1.50	Communication with T. Taylor and D. Vorhis regarding transport of M. Wyatt and related logistics
3/29/2017	Erin E. Lyons	1.00	Compile requested materials for trial
3/29/2017	Erin E. Lyons	0.50	Finalize rental equipment arraignments for trial
3/30/2017	Gordon D. Todd	10.00	Continue to prep for trial including working on witness to call, witness order, motions in limine, trial strategy, and examinations
3/30/2017	Benjamin Beaton	0.30	Work on pretrial motions
3/30/2017	Benjamin Beaton	0.50	Trial prep call with D. Hay and R. Wright
3/30/2017	Benjamin Beaton	0.30	Trial prep
3/30/2017	Benjamin Beaton	0.20	Call with M. Branch regarding meet and confer call
3/30/2017	Robin Wright	0.30	Call with B Beaton and D Hay about deadlines
3/30/2017	Robin Wright	2.80	Research standard for pretrial deposition
3/30/2017	Daniel J. Hay	0.40	Call with B. Beaton and R. Wright concerning case status
3/30/2017	Daniel J. Hay	3.50	Draft bench brief on prior use of force
3/30/2017	Daniel J. Hay	0.20	Draft email to B. Beaton on status of motions in limine
3/30/2017	Morgan Branch	2.00	Meet with Dr. Smith

May 19, 2017
Page 37

3/30/2017	Morgan Branch	2.00	Trial prep including working on expert examination
3/30/2017	Erin E. Lyons	1.00	Prepare incident videos for review
3/30/2017	Erin E. Lyons	0.50	Review task list and calendar to confirm upcoming deadlines
3/30/2017	Erin E. Lyons	1.00	Coordinate visit with client
3/31/2017	Gordon D. Todd	5.00	Continue revising hostile direct examinations
3/31/2017	Benjamin Beaton	1.20	Trial prep including expert examinations
3/31/2017	Benjamin Beaton	0.90	Prepare for meet and confer regarding evidentiary issues
			Meet and confer with opposing counsel regarding stipulations and pretrial motions
3/31/2017	Benjamin Beaton	0.40	
3/31/2017	Benjamin Beaton	0.30	Revise witness list
3/31/2017	Benjamin Beaton	0.30	Telephone conferences with G. Todd, M. Branch regarding pretrial motions
3/31/2017	Robin Wright	3.10	Research for jury instructions
3/31/2017	Daniel J. Hay	5.30	Draft bench brief on prior use of force
			Call with B. Beaton, M. Branch, and opposing counsel concerning stipulations
3/31/2017	Daniel J. Hay	0.80	
3/31/2017	Daniel J. Hay	0.50	Draft email memorializing stipulations
3/31/2017	Morgan Branch	1.00	Finalize and serve witness list
3/31/2017	Morgan Branch	0.50	Call with opposition counsel regarding stipulations
3/31/2017	Erin E. Lyons	1.50	Pull and compile street views and aerials of various areas in Danville
3/31/2017	Erin E. Lyons	1.00	Review, edit and file supplemental witness list
3/31/2017	Erin E. Lyons	0.50	Locate, review and scan notes related to D. Waller to B. Beaton
4/1/2017	Gordon D. Todd	4.00	Review Young deposition transcript
4/1/2017	Gordon D. Todd	3.00	Draft opening statement
4/1/2017	Gordon D. Todd	0.50	Strategize regarding dropping defendants
4/1/2017	Benjamin Beaton	0.30	Trial prep
4/1/2017	Robin Wright	3.20	Wershale cross examination outline
			Draft email to research librarian identifying relevant documents in Kopf v. Skyrn docket
4/1/2017	Daniel J. Hay	0.60	Respond to emails from G. Todd concerning admissibility of character evidence
4/1/2017	Daniel J. Hay	0.50	
4/1/2017	Erin E. Lyons	1.00	Respond to case related emails and inquiries
4/2/2017	Gordon D. Todd	3.00	Finalize draft opening statement
4/2/2017	Benjamin Beaton	1.40	Draft examination outlines
4/2/2017	Robin Wright	5.00	Wershale cross examination outline
4/2/2017	Erin E. Lyons	0.50	Respond to case related emails and inquiries
4/3/2017	Gordon D. Todd	1.00	Team meeting to review trial order and strategy
			Continue to prepare for trial working on witness outlines, pre-trial motions, and jury instructions
4/3/2017	Gordon D. Todd	10.00	
4/3/2017	Benjamin Beaton	1.20	Team meeting re trial
4/3/2017	Benjamin Beaton	0.50	Revise motion in limine
			Work on trial prep, including exhibit objections, trial subpoenas, and Wershale outline
4/3/2017	Benjamin Beaton	3.20	
4/3/2017	Benjamin Beaton	1.20	Revise jury instructions
4/3/2017	Benjamin Beaton	1.20	Outline Waller/Wershale examinations
4/3/2017	Benjamin Beaton	0.30	Office conferences with G. Todd, M. Branch, E. Lyons regarding trial prep
4/3/2017	Benjamin Beaton	0.20	Telephone conference with M. Branch regarding M. Wyatt prep
4/3/2017	Robin Wright	0.20	Pull cases for motion to exclude
4/3/2017	Robin Wright	1.20	Trial preparation meeting
4/3/2017	Robin Wright	0.30	Revise jury instructions

May 19, 2017
Page 38

4/3/2017	Daniel J. Hay	1.10	Weekly case meeting with G. Todd, B. Beaton, M. Branch, R. Wright, and E. Lyons
4/3/2017	Daniel J. Hay	0.30	Meet with B. Beaton and M. Branch to discuss upcoming deadlines
4/3/2017	Daniel J. Hay	2.40	Revise second motion in limine (omnibus)
4/3/2017	Daniel J. Hay	0.30	Call with local practitioner to discuss § 1983 case
4/3/2017	Daniel J. Hay	0.20	Revise examination outline for T. Nicholson
4/3/2017	Erin E. Lyons	2.50	Create searchable files with all discovery received from defendants', Pittsylvania County and Danville Police Department
4/3/2017	Erin E. Lyons	0.50	Weekly case team meeting
4/3/2017	Erin E. Lyons	3.00	Review and compile trial exhibits
4/3/2017	Erin E. Lyons	1.00	Prepare and send trial subpoenas to C. Goins and P. Broadfoot, attempts to locate a process server in Danville area
4/3/2017	Erin E. Lyons	0.50	Coordinate with Lawyers Travel regarding hotel accommodations in Lynchburg for upcoming pretrial conference
4/3/2017	Erin E. Lyons	0.50	Revise exhibits for upcoming filing
4/4/2017	Gordon D. Todd	4.00	Work on Owens examination
4/4/2017	Gordon D. Todd	2.50	Review and revise jury instructions, stipulations, objections
4/4/2017	Gordon D. Todd	0.60	Review defendants filings
4/4/2017	Benjamin Beaton	2.30	Finalize stipulations, exhibit objections, and pretrial submissions
4/4/2017	Benjamin Beaton	7.50	Draft Wershbae examination outline
4/4/2017	Benjamin Beaton	3.10	Work on jury instructions and Wershbae exam outline
4/4/2017	Benjamin Beaton	0.20	Trial prep
4/4/2017	Robin Wright	7.50	Revise jury instructions
4/4/2017	Daniel J. Hay	0.80	Prepare second motion in limine for filing
4/4/2017	Daniel J. Hay	0.50	Revise omnibus motion in limine
4/4/2017	Daniel J. Hay	2.10	Revise jury instructions
4/4/2017	Daniel J. Hay	0.90	Draft direct examination of T. Nicholson
4/4/2017	Daniel J. Hay	0.50	Review defendants' proposed jury instructions
4/4/2017	Erin E. Lyons	0.50	Communicate with River North regarding visit
4/4/2017	Erin E. Lyons	0.50	Revise exhibits to accompany motion in limine
4/4/2017	Erin E. Lyons	3.00	Revise and number trial exhibits
4/4/2017	Erin E. Lyons	1.50	Compile and organize hard copy materials for trial
4/4/2017	Erin E. Lyons	0.50	Coordinate hotel accommodations for R. Wright and A. Ferguson
4/4/2017	Erin E. Lyons	0.50	Communicate with Opveon regarding trial needs
4/4/2017	Erin E. Lyons	0.50	Communicate with B. Reed regarding Wershbae errata
4/5/2017	Gordon D. Todd	8.00	Continue to work on trial prep
4/5/2017	Benjamin Beaton	7.30	Trial prep including Young examination, review opening, trial themes
4/5/2017	Benjamin Beaton	0.70	Team meeting regarding trial prep
4/5/2017	Benjamin Beaton	0.60	Telephone conference with J. Guynn regarding pretrial issues
4/5/2017	Benjamin Beaton	0.60	Confer with Sidley team regarding witness and opposing counsel discussions
4/5/2017	Robin Wright	0.90	Trial prep meeting
4/5/2017	Daniel J. Hay	0.80	Meeting with B. Beaton, M. Branch, R. Wright, and E. Lyons to discuss upcoming briefing deadlines
4/5/2017	Daniel J. Hay	1.70	Draft opposition to defendants' motion in limine
4/5/2017	Daniel J. Hay	0.50	Respond to email from G. Todd on use of force motion in limine
4/5/2017	Erin E. Lyons	1.50	Case team meeting and related follow up
4/5/2017	Erin E. Lyons	1.50	Prepare hard copies of trial exhibits
4/5/2017	Erin E. Lyons	0.50	Locate process server for trial subpoena service
4/5/2017	Erin E. Lyons	0.50	Communicate with Lawyers Travel regarding various accommodations

May 19, 2017
Page 39

4/6/2017	Gordon D. Todd	10.00	Continue with trial prep including working on Owens, Wyatt and Worsham examinations and review of other lawyers' drafts
4/6/2017	Benjamin Beaton	8.90	Trial prep including Young direct, Nicholson cross, call with Waller, and confer with Sidley team
4/6/2017	Daniel J. Hay	2.70	Draft opposition to motion in limine
4/6/2017	Erin E. Lyons	1.50	Update various hotel accommodations and travel arrangements
4/6/2017	Erin E. Lyons	1.00	Communicate with local process server and mail trial subpoenas to C. Whitfield
4/6/2017	Erin E. Lyons	1.00	Internal conversations with T. Shim regarding trial logistics and needs
4/6/2017	Erin E. Lyons	0.50	Coordinate visit with M. Wyatt
4/7/2017	Gordon D. Todd	4.00	Continue Trial prep
4/7/2017	Benjamin Beaton	2.10	Draft Nicholson examination outline
4/7/2017	Benjamin Beaton	1.50	Trial prep
4/7/2017	Benjamin Beaton	1.40	Team meeting regarding trial prep
4/7/2017	Benjamin Beaton	1.00	Revise Owens examination outline
4/7/2017	Benjamin Beaton	0.70	Revise supplemental expert disclosure
4/7/2017	Benjamin Beaton	0.30	Telephone conference with D. Waller regarding disclosure
4/7/2017	Daniel J. Hay	3.70	Draft opposition to motion in limine
4/7/2017	Daniel J. Hay	0.50	Revise opposition to motion in limine
4/7/2017	Daniel J. Hay	1.50	Meeting with G. Todd, B. Beaton, M. Branch, and E. Lyons to discuss trial strategy
4/7/2017	Erin E. Lyons	1.50	Case team meeting
4/7/2017	Erin E. Lyons	1.50	Compile requested materials associated with proposed jury instructions
4/7/2017	Erin E. Lyons	1.50	Upload deposition videos for use at trial
4/7/2017	Erin E. Lyons	1.00	Adjust reservations and accommodations for trial
4/7/2017	Erin E. Lyons	1.00	Prepare hard copy materials for upcoming pretrial conference
4/7/2017	Erin E. Lyons	0.50	Request text version of Waller deposition transcript
4/8/2017	Gordon D. Todd	6.00	Continue trial prep including revising expert exams and non-defendant exams
4/8/2017	Benjamin Beaton	1.20	Revise Simpson motion
4/8/2017	Benjamin Beaton	1.70	Revise MIL and pretrial arguments for pretrial hearing
4/8/2017	Robin Wright	1.50	Motion to exclude Simpson
4/8/2017	Daniel J. Hay	2.90	Revise opposition to motion in limine
4/9/2017	Benjamin Beaton	2.20	Revise pretrial submissions
4/9/2017	Daniel J. Hay	0.20	Review motion to exclude R. Simpson
4/9/2017	Erin E. Lyons	4.30	Correct and revise exhibits and create requested index of exhibits
4/10/2017	Gordon D. Todd	2.50	Review and revise Worsham direct outline
4/10/2017	Gordon D. Todd	0.30	Strategize regarding potential examination of Officer Abbott
4/10/2017	Gordon D. Todd	0.30	Work on trial presentation strategy
4/10/2017	Benjamin Beaton	2.10	Trial prep
4/10/2017	Benjamin Beaton	1.40	Revise pretrial order
4/10/2017	Benjamin Beaton	1.40	Work on pretrial submissions
4/10/2017	Benjamin Beaton	0.90	Pretrial conference team meeting
4/10/2017	Benjamin Beaton	0.40	Telephone conference with J. Guynn regarding pretrial order
4/10/2017	Robin Wright	1.00	Trial preparation meeting
4/10/2017	Robin Wright	0.60	Highlight cases for jury instruction binder
4/10/2017	Daniel J. Hay	0.90	Meet with B. Beaton, M. Branch, R. Wright, and E. Lyons to discuss upcoming filings and hearing
4/10/2017	Daniel J. Hay	2.10	Finalize response in opposition to motion in limine
4/10/2017	Daniel J. Hay	0.50	Prepare materials for pretrial conference

May 19, 2017
Page 40

4/10/2017	Morgan Branch	1.00	Team trial meeting
4/10/2017	Morgan Branch	3.50	Trial preparation
4/10/2017	Erin E. Lyons	0.50	Case team meeting
4/10/2017	Erin E. Lyons	4.00	Prepare materials for upcoming pretrial conference
4/10/2017	Erin E. Lyons	1.50	Create exhibits and review, edit and file documents
4/10/2017	Erin E. Lyons	1.50	Upload content for trial
4/11/2017	Gordon D. Todd	0.60	Work on draft pre-trial joint motion and order
4/11/2017	Gordon D. Todd	1.80	Work on S. Wyatt direct
4/11/2017	Benjamin Beaton	0.50	Telephone conference with J. Guynn regarding trial and motions
4/11/2017	Benjamin Beaton	0.30	Revise integrated pretrial order
4/11/2017	Benjamin Beaton	3.10	Prep for pretrial hearing
4/11/2017	Benjamin Beaton	1.60	Trial prep
4/11/2017	Benjamin Beaton	1.30	Work on voir dire questions
4/11/2017	Benjamin Beaton	1.60	Work on jury instructions and legal motions
4/11/2017	Robin Wright	3.50	Jury instruction comparison chart
4/11/2017	Daniel J. Hay	2.10	Research standard of proof for punitive damages
4/11/2017	Daniel J. Hay	1.80	Draft reply in support of second motion in limine
4/11/2017	Daniel J. Hay	0.20	Draft affidavits of service
4/11/2017	Daniel J. Hay	0.20	Meet with B. Beaton to discuss status conference
4/11/2017	Daniel J. Hay	0.20	Research certificate requirement of Rule 45(b)(4).
4/11/2017	Daniel J. Hay	0.20	Review objections to jury instructions
4/11/2017	Daniel J. Hay	0.10	Instruct N. Menendez on material preparation for status conference
4/11/2017	Morgan Branch	3.00	Trial preparation
4/11/2017	Erin E. Lyons	0.50	Complete forms and related logistics associated with upcoming visit with client
4/11/2017	Erin E. Lyons	3.00	Compile materials for pretrial conference
4/11/2017	Erin E. Lyons	0.50	Draft Notice of Service
4/12/2017	Gordon D. Todd	2.00	Pre-trial conference
4/12/2017	Gordon D. Todd	1.00	Finalize omnibus motion in limine reply
4/12/2017	Gordon D. Todd	1.50	Work on Owens direct
4/12/2017	Benjamin Beaton	3.50	Prepare for pretrial conference while traveling from DC to Lynchburg VA
4/12/2017	Benjamin Beaton	3.50	Work on trial prep during travel from Lynchburg to DC
4/12/2017	Benjamin Beaton	2.00	Argue pretrial motions during pretrial conference
4/12/2017	Benjamin Beaton	1.00	Prepare for pretrial conference
4/12/2017	Benjamin Beaton	3.00	Draft Waller expert examination outline
4/12/2017	Daniel J. Hay	0.30	Prepare materials for client visit
4/12/2017	Daniel J. Hay	0.70	Prepare reply in support of motion in limine for filing
4/12/2017	Daniel J. Hay	0.10	Draft email to B. Beaton with notes on pretrial conference
4/12/2017	Morgan Branch	4.50	Prepare for pre-trial conference
4/12/2017	Morgan Branch	2.00	Pre-Trial Conference
4/12/2017	Morgan Branch	3.50	Work on trial prep during travel from Lynchburg to DC
4/12/2017	Erin E. Lyons	1.50	Post pre-trial conference follow up and related tasks
4/13/2017	Gordon D. Todd	2.00	Work on opening statement
4/13/2017	Benjamin Beaton	4.70	Draft Waller examination outline
4/13/2017	Benjamin Beaton	1.00	Trial prep meeting with Sidley team
4/13/2017	Benjamin Beaton	0.40	Telephone conference with G. Todd regarding trial prep
4/13/2017	Benjamin Beaton	1.10	Trial prep
4/13/2017	Robin Wright	0.90	Correspondence requesting transcript of pretrial hearing

May 19, 2017
Page 41

4/13/2017	Robin Wright	0.90	Trial preparation meeting
4/13/2017	Daniel J. Hay	1.30	Draft email to chambers regarding defendants' notice of authority (Hottle)
			Meet with B. Beaton, M. Branch, R. Wright, and E. Lyons to discuss trial preparations
4/13/2017	Daniel J. Hay	1.20	
4/13/2017	Daniel J. Hay	0.80	Call with local practitioner concerning recent § 1983 case
4/13/2017	Daniel J. Hay	0.20	Draft email to local practitioner concerning recent § 1983 case
4/13/2017	Morgan Branch	6.00	Trial preparation
4/13/2017	Erin E. Lyons	1.50	Case team meeting
4/13/2017	Erin E. Lyons	4.50	Prepare materials for trial
			Communicate with Green Rock Correctional center regarding upcoming visits and transport related logistics
4/13/2017	Erin E. Lyons	1.50	
4/14/2017	Gordon D. Todd	1.40	Review and revise Waller direct
4/14/2017	Gordon D. Todd	1.20	Review and revise M. Wyatt direct outline
4/14/2017	Gordon D. Todd	0.90	Strategize with team regarding use of prior use of force materials
4/14/2017	Gordon D. Todd	0.50	Review juror research
4/14/2017	Benjamin Beaton	4.30	Trial prep
4/14/2017	Benjamin Beaton	3.70	Prepare Waller direct exam
4/14/2017	Benjamin Beaton	1.00	Work on M. Wyatt testimony
4/14/2017	Benjamin Beaton	0.60	Telephone conference with D. Waller regarding testimony
4/14/2017	Benjamin Beaton	0.50	Telephone conference with M. Branch, D. Hay regarding Wyatt prep
4/14/2017	Benjamin Beaton	0.40	Telephone conference with J. Guynn regarding witnesses
4/14/2017	Benjamin Beaton	0.20	Telephone conference with M. Branch regarding Wyatt prep
4/14/2017	Robin Wright	4.70	Review potential juror list
4/14/2017	Daniel J. Hay	7.00	Meet with M. Wyatt to prepare for trial testimony
4/14/2017	Daniel J. Hay	0.70	Prepare for meeting with M. Wyatt
4/14/2017	Daniel J. Hay	0.60	Review juror research
4/14/2017	Daniel J. Hay	0.30	Call with B. Beaton and M. Branch to discuss client meeting
4/14/2017	Morgan Branch	5.50	Trial witness preparation
4/14/2017	Morgan Branch	5.00	Trial preparation
4/14/2017	Erin E. Lyons	8.50	Prepare materials for trial
4/15/2017	Gordon D. Todd	0.40	Attention to trial assignments and strategy
4/15/2017	Gordon D. Todd	0.30	Strategize with team regarding use of use of force policies
4/15/2017	Gordon D. Todd	0.20	Review redacted versions of exhibits
4/15/2017	Benjamin Beaton	4.20	Prepare legal write-ups and evidence for Wyatt trial
4/15/2017	Robin Wright	2.10	Research prior use of force evidence to impeach a witness
4/15/2017	Daniel J. Hay	4.30	Draft cross examination outline of M. Taylor
4/15/2017	Daniel J. Hay	3.10	Read deposition transcript of M. Taylor
4/15/2017	Daniel J. Hay	0.60	Read excerpts of P. Broadfoot deposition transcript
4/15/2017	Morgan Branch	7.00	Trial preparation
4/15/2017	Erin E. Lyons	0.70	Trial prep
			Trial preparation including review of direct examination outlines, files for transport to Danville, jury selection materials, and legal argument briefing notes
4/16/2017	Gordon D. Todd	7.50	
4/16/2017	Benjamin Beaton	5.30	Prepare for trial while traveling to Danville
4/16/2017	Benjamin Beaton	2.50	Revise witness outlines
4/16/2017	Daniel J. Hay	1.00	Meet with G. Todd, B. Beaton, and M. Branch to discuss trial logistics
4/16/2017	Daniel J. Hay	0.60	Research potential juror
4/16/2017	Daniel J. Hay	0.60	Review revised direct examination outline of M. Wyatt
4/16/2017	Daniel J. Hay	0.40	Compile materials for trial box

May 19, 2017
Page 42

4/16/2017	Daniel J. Hay	0.40	Revise direct examination outline of M. Taylor
4/16/2017	Morgan Branch	5.00	Trial preparation
4/16/2017	Erin E. Lyons	3.00	Trial Prep
			Trial preparation including final review and revision of direct examination outlines for Tuesday witnesses; review and discussion with team of all jury pool members to develop ranking system; confer with team regarding, strategic question of whether and when to call client; visit courthouse for technology walk-through; confer with J. Weihtold regarding technology use at trial
4/17/2017	Gordon D. Todd	12.00	Trial prep with M. Young, D. Waller, courtroom tech specialist, and Sidley trial team
4/17/2017	Benjamin Beaton	9.50	Work on witness examination outlines
4/17/2017	Benjamin Beaton	6.80	Jury research
4/17/2017	Robin Wright	4.10	Organizing exhibits and witness outlines
4/17/2017	Robin Wright	6.50	War room setup
4/17/2017	Robin Wright	3.00	Meet with M. Wyatt to prepare for trial
4/17/2017	Daniel J. Hay	4.00	Research reasonable fee award for settlement negotiations
4/17/2017	Daniel J. Hay	1.70	Draft email to B. Beaton on credibility challenge based on consistent excuses
4/17/2017	Daniel J. Hay	1.30	Prepare materials for examination of M. Young
4/17/2017	Daniel J. Hay	1.20	Revise cross examination outline of M. Taylor
4/17/2017	Daniel J. Hay	1.20	Meet with G. Todd, M. Branch, and R. Wright to prepare for voir dire
4/17/2017	Daniel J. Hay	0.80	Draft settlement offer
4/17/2017	Daniel J. Hay	0.50	Review depositions for discussion of amendments to Policy 2-6
4/17/2017	Daniel J. Hay	0.30	Compile trial folder of venire and Batson research
4/17/2017	Daniel J. Hay	0.10	Trial preparation
4/17/2017	Morgan Branch	12.00	Pull and prepare materials for trial
4/17/2017	Erin E. Lyons	8.50	Jury selection; opening argument; witness presentations; prepare for Wednesday witnesses and legal issues
4/18/2017	Gordon D. Todd	16.00	Wyatt trial
4/18/2017	Benjamin Beaton	7.50	Prepare for witness examinations and legal argument
4/18/2017	Benjamin Beaton	5.70	Prepare for next day's examinations and motions
4/18/2017	Benjamin Beaton	3.20	Organize exhibits and witness outlines
4/18/2017	Robin Wright	2.50	Update juror chart
4/18/2017	Robin Wright	1.50	Draft bench brief on admissibility of use of force reports
4/18/2017	Daniel J. Hay	2.90	Compile impeachment exhibits for examination of S. Wyatt
4/18/2017	Daniel J. Hay	0.40	Research deposition testimony concerning Reynolds report
4/18/2017	Daniel J. Hay	0.30	Trial
4/18/2017	Morgan Branch	7.50	Trial Preparation
4/18/2017	Morgan Branch	6.00	Review minute order and discuss trial proceedings with M. Branch
4/18/2017	Erin E. Lyons	0.50	Trial witness presentations and arguments; review draft jury instructions; draft closing argument
4/19/2017	Gordon D. Todd	16.00	Wyatt trial
4/19/2017	Benjamin Beaton	7.50	Prepare for witness examinations and legal arguments
4/19/2017	Benjamin Beaton	10.10	Organize witness outlines and exhibits
4/19/2017	Robin Wright	2.00	Compile notes for G Todd for closing argument
4/19/2017	Robin Wright	1.50	Draft Worsham impeachment outline
4/19/2017	Robin Wright	1.50	Organize Worsham exhibits
4/19/2017	Robin Wright	1.50	Draft motion to admit investigative findings
4/19/2017	Daniel J. Hay	1.10	Prepare materials for motion to admit investigative findings
4/19/2017	Daniel J. Hay	0.60	

May 19, 2017
Page 43

4/19/2017	Daniel J. Hay	2.00	Draft notes for potential cross examination of defendants
4/19/2017	Daniel J. Hay	1.50	Review court's proposed jury instructions
4/19/2017	Daniel J. Hay	0.50	Discuss court's proposed instructions with G. Todd and B. Beaton
4/19/2017	Daniel J. Hay	0.20	Draft email to court concerning jury instructions
4/19/2017	Morgan Branch	7.50	Trial
4/19/2017	Morgan Branch	4.00	Trial preparation
4/19/2017	Erin E. Lyons	3.00	Locate and pull requested materials for trial
4/19/2017	Erin E. Lyons	1.50	Prepare and send requested DVDs with videos and medical images
4/19/2017	Erin E. Lyons	1.00	Prepare, QC and send requested DVDs to trial team
4/20/2017	Gordon D. Todd	12.00	Trial; final witness examinations and cross examinations; closing arguments; jury charge and deliberations, and verdict
4/20/2017	Benjamin Beaton	9.70	Wyatt trial
4/20/2017	Benjamin Beaton	4.20	Prepare for witness examinations and legal arguments
4/20/2017	Robin Wright	3.50	Organize exhibits and witness outlines
4/20/2017	Daniel J. Hay	1.80	Draft notes for potential cross examination of defendants
4/20/2017	Daniel J. Hay	1.00	Draft talking points for court's question on Rule 608(b)
4/20/2017	Morgan Branch	9.00	Trial
4/20/2017	Erin E. Lyons	2.00	Trial logistics and coordination of tear down of war room
4/21/2017	Gordon D. Todd	2.50	Work on post-trial debriefing and strategy; clean up courtroom and war room
4/21/2017	Benjamin Beaton	1.00	Organize trial materials and war room
4/24/2017	Erin E. Lyons	2.00	Review hard copy materials from trial
	Total Hours	2,9000.3	

EXHIBIT 1-C

SIDLEY AUSTIN LLP
Request for Payment

Accounting Use Only

Vendor #:
Voucher #:
Fed Tax ID:
RB 1:
RB 2:

DATE: April 25, 2017

PAYABLE TO / ADDRESS: Waller & Associates, LLC
15850 W. Bluemound Road, Suite 308
Brookfield, WI 53005


CHARGE TO: ☒ Client ☐ Office


Client/Matter Number: 66519-90020

Client/Matter Name: Michael E. Wyatt/Section 1983 Matter

Funds Expended For: Expert Expenses

Meal Expense	<input type="text"/>
Non-Meal Expense	<u>\$14,084.61</u>
TOTAL AMOUNT:	<u>\$14,084.61</u>


Incurred by Signature


Authorized by Signature

<u>08427</u>	<u> </u>
User ID	Group #
<u>62269</u>	<u> </u>
User ID	Group #

MEAL SUPPLEMENT
(This portion must be completed when requesting payment for meal expense)

AMOUNT OF MEAL EXPENSE:

Indicate the nature for which reimbursement is requested and list attendees at the meal. Submit additional information in the "Funds expended for" section above.

(ORIGINAL RECEIPTS MUST BE ATTACHED)

Meals Related to:
(Mark one with an X)

<input type="checkbox"/> Overtime	<input type="checkbox"/> In House Business
<input type="checkbox"/> Recruiting	<input type="checkbox"/> Out of Office Business
<input type="checkbox"/> Other (explain) _____	

ATTENDEES: _____

Special Instructions: _____

WALLER & ASSOCIATES, LLC

15850 W. Bluemound Road, Suite 308
Brookfield, Wisconsin 53005
(262) 782-5515 • Fax (262) 641-0508
www.wallerassociates.com

Dennis Waller, CLI
denny1@gdinet.com

INVOICE

Date: April 24, 2017

To: Attorney Benjamin Beaton
Sidley Austin LLP
1501 K Street
Washington, DC 20005

Reference: **Michael Wyatt v. Owens, et al.**
USDC, West. Dist. VA: Case No.: 7:14-cv-00492

Case review; consultations with Attorneys; trial preparation; travel to/from Danville, VA [see attached work log for details] = 31.4 hours x \$200/hour = \$6,280
3 days trial x \$2,000/day = \$6,000
Expenses = \$1,804.61

Air fare = \$628.06
Lodging = \$747.04
Rental car = \$387.01
Parking – Milwaukee = \$42.50

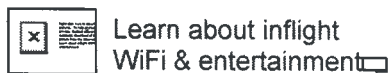
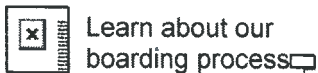
TOTAL DUE: \$14,084.61

Please make payment to:
Payment due upon receipt.

Waller & Associates, LLC
Federal Tax #39-2002184

Work Log – Wyatt

9/12/16	Motion in Limine – Waller	.2	
9/16/16	Depo – Wershbale	1.8	
9/19/16	PL – Opposition Motion in Limine	.4	
4/5/17	Depo – Young; review/summary depo – Wershbale	2.9	
4/6/17	Tele w/ Atty; review file; draft addendum report	5.3	
4/7/17	Finalize/subm addendum report	2.3	
4/14/17	Tele w/ Atty; trial prep	2.5	
4/17/17	Travel to Danville, VA	8	
4/18/17	Trial		
4/19/17	Trial		
4/20/17	Trial		
4/21/17	Travel to Milwaukee	8	
			/31.4



Cost and Payment Summary

☐ AIR - 596JNX

Base Fare	\$ 460.89
Excise Taxes	\$ 34.57
Segment Fee	\$ 16.40
Passenger Facility Charge	\$ 18.00
September 11th Security Fee	\$ 11.20
EarlyBird	\$ 30.00
Total Air Cost	\$ 571.06

Payment Information

Payment Type: Visa XXXXXXXXXXXX1736
 Date: Apr 6, 2017
 Payment Amount: \$541.06
 Payment Type: Visa XXXXXXXXXXXX1736
 Date: Apr 6, 2017
 Payment Amount: \$15.00

change

+57
~~\$628.06~~

Payment Type: Visa XXXXXXXXXXXX1736
 Date: Apr 6, 2017
 Payment Amount: \$15.00

Useful Tools

[Check In Online](#)
[Early Bird Check-In](#)
[View/Share Itinerary](#)
[Change Air Reservation](#)
[Cancel Air Reservation](#)
[Check Flight Status](#)
[Flight Status Notification](#)
[Book a Car](#)
[Book a Hotel](#)

Know Before You Go

[In the Airport](#)
[Baggage Policies](#)
[Suggested Airport Arrival Times](#)
[Security Procedures](#)
[Customers of Size](#)
[In the Air](#)
[Purchasing and Refunds](#)

Special Travel Needs

[Traveling with Children](#)
[Traveling with Pets](#)
[Unaccompanied Minors](#)
[Baby on Board](#)
[Customers with Disabilities](#)

Legal Policies & Helpful Information

[Privacy Policy](#) [Customer Service Commitment](#) [Contact Us](#)
[Notice of Incorporated Terms](#) [FAQs](#)

Dennis Waller

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Thursday, April 13, 2017 2:31 PM
To: denny1@gdinet.com
Subject: 04/17 Southwest trip (596JNX): Here's your itinerary!

Prepare for check in and download our WiFi app. | [View our mobile site](#)



[Manage Flight](#) | [Flight Status](#) | [My Account](#)



Travel notice

Self-tagging available: [Learn more](#)

APRIL 17 - APRIL 19

MKE  RDU

[Full itinerary](#)

Milwaukee to Raleigh/Durham

Confirmation # **596JNX**

PASSENGER

Dennis Waller

[Check in](#)

Please note you will only be able to check in within 24 hours prior to your scheduled departure.

Your complete itinerary

Flight 1: Monday, 04/17/2017

FLIGHT
1185

DEPARTS

MKE 6:40AM

Milwaukee



ARRIVES

BWI 9:35AM

Baltimore

Stop:



Change planes

FLIGHT
329

DEPARTS
BWI 12:45PM
Baltimore



ARRIVES
RDU 1:50PM
Raleigh/Durham

Flight 2: Wednesday, 04/19/2017

FLIGHT
1536

DEPARTS
RDU 5:50PM
Raleigh/Durham



ARRIVES
ATL 7:15PM
Atlanta

Stop:  Change planes

FLIGHT
1746

DEPARTS
ATL 10:25PM
Atlanta



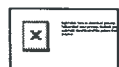
ARRIVES
MKE 11:30PM
Milwaukee



Mobile boarding pass is a boarding YES

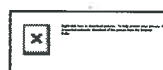
The easiest way to pass through security and board your flight.

[Learn more >](#)

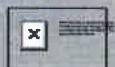


Rentals as low as \$15 per day

+ earn 1,200 Rapid Rewards® points.



[Book car >](#)



Earn up to 10,000 Rapid Rewards® points per night

Choose a hotel.

[Book hotel >](#)



Earn 40,000 points

Plus, earn points on every purchase, enjoy Anniversary points, and more with the Rapid Rewards® Credit Card.

[Learn more >](#)

From: Southwest Airlines <SouthwestAirlines@luv.southwest.com>
Sent: Thursday, April 06, 2017 4:53 PM
To: denny1@gdinet.com
Subject: Flight reservation (596JNX) | 17APR17 | MKE-RDU | Waller/Dennis Keith

Thanks for choosing Southwest® for your trip.



[Log in](#) | [View my itinerary](#)

[Check In
Online](#)

[Check Flight
Status](#)

[Change
Flight](#)

[Special
Offers](#)

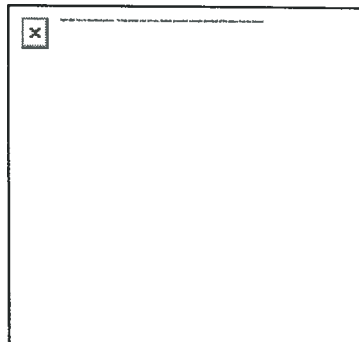
[Hotel
Offers](#)

[Car
Offers](#)

Ready for takeoff!



Thanks for choosing Southwest® for your trip. You'll find everything you need to know about your reservation below. Happy travels!



[Air itinerary](#)

AIR Confirmation: 596JNX

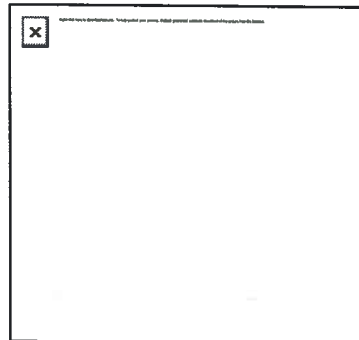
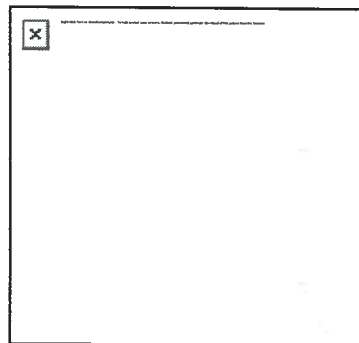
241 28

Confirmation Date: 04/6/2017

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
WALLER/DENNIS K EITH	20166661340	5262499552762	Apr 6, 2018	2765

Rapid Rewards points earned are only estimates. Visit your (MySouthwest, Southwest.com or Rapid Rewards) account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Mon Apr 17	1185	Depart MILWAUKEE, WI (MKE) on Southwest Airlines at 06:40 AM Arrive in BALTIMORE/WASHINGTON, MD (BWI) at 09:35 AM <u>Senior</u>
	329	Change planes to Southwest Airlines in BALTIMORE/WASHINGTON, MD (BWI) at 12:45 PM Arrive in RALEIGH/DURHAM, NC (RDU) at 1:50 PM Travel Time 6 hrs 10 mins <u>Senior</u>



Español FLIGHT | HOTEL | CAR | SPECIAL OFFERS | RAPID REWARDS® 

55 AQ515

Select Senior Fare (age 65+)

Photo ID is required at airport checkin. Visit our [Senior Fares](#) page for more information.

There are no available flights for the selected filter. Below are the flight options for your selected cities and dates.

Select Departing Flight:
Raleigh/Durham, NC to Milwaukee, WIModify Search ☐ Round Trip ☒ One-Way[Additional Search Options](#)

From:

Raleigh/Durham, NC - RDU

To:

Milwaukee, WI - MKE

+ [Add another flight](#)First 2 Bags Fly Free®. [Weight, size & excess limits apply.](#) [Gov't taxes & fees now included](#)

APR 16 SUN	APR 17 MON	APR 18 TUE	APR 19 WED	APR 20 THU	APR 21 FRI	APR 22 SAT	APR 23 SUN	APR 24 MON	APR 25 TUE	APR 26 WED
------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------	------------------

596-12X

All fares are rounded up to the nearest dollar.

Depart	Arrive	Flight #	Routing	Travel Time	Business Select \$369	Anytime \$353	Senior \$300	Wanna Get Away
5:30 AM	10:50 AM	991 4559	1 stop Change Planes TPA	6h 20m	<input type="radio"/> \$369	<input type="radio"/> \$353	<input type="radio"/> \$300	
6:25 AM	9:35 AM	1444 710	1 stop Change Planes ATL	4h 10m	<input type="radio"/> \$369	<input type="radio"/> \$353	<input type="radio"/> \$300	
10:25 AM	1:10 PM	419 771	1 stop Change Planes BWI	3h 45m	<input type="radio"/> \$369	<input type="radio"/> \$353	<input type="radio"/> \$300	More Advance Purchase Required. Fare Unavailable for Date Selected.
11:30 AM	5:00 PM	1883 1450	1 stop Change Planes ATL	6h 30m	<input type="radio"/> \$369	<input type="radio"/> \$353	<input type="radio"/> \$300	
5:05 PM	10:25 PM	4467 4767	1 stop Change Planes MCO	6h 20m	<input type="radio"/> \$369	<input type="radio"/> \$353	<input type="radio"/> \$300	
5:50 PM	11:30 PM	1536 1746	1 stop Change Planes ATL	6h 40m	<input type="radio"/> \$369	<input type="radio"/> \$353	<input type="radio"/> \$300	

\$57 add for
change fee from
4/19 to 4/21

Price selected flight(s)

Continue

Important Fare & Schedule Information

All fares and fare ranges are subject to change until purchased.

Flight ontime performance statistics can be viewed by clicking on the individual flight numbers.

All fares and fare ranges listed are per person for each way of travel.

"Unavailable" indicates the corresponding fare is unavailable for the selected travel date(s), the search did not meet certain fare requirements, or the flight has already departed.

"Sold Out" indicates that the flight is sold out for the corresponding fare type or the number of passengers in your reservation exceeds the number of remaining available seats for the corresponding fare type.

"Invalid w/ Depart or Return Dates" indicates that our system cannot return a valid itinerary option(s) with the search criteria submitted. This can occur when flights are sold out in one direction of a roundtrip search or with a same-day roundtrip search. These itineraries may become valid options if you search with a different depart or return date and/or for a one way flight instead.

"Travel Time" represents the total elapsed time for your trip from your departure city to your final destination including stops, layovers, and time zone changes.

Along with our everyday low fares you may inquire about our discounts off the "Anytime" fare for [infant](#), [child \(2-11\)](#), and [military](#) fares by calling 1-800-I-FLY-SWA (1-800-435-9792).[Group Reservations](#): Ten or more Customers traveling from/to the same origin/destination. Discounts vary. Call 1-800-433-5368.

Dennis Waller

From: Thanks for staying! <efolio@courtyard.com>
Sent: Monday, April 24, 2017 3:12 AM
To: DENNY1@GDINET.COM
Subject: Your Apr 17, 2017 - Apr 21, 2017 stay at the Courtyard Danville

Thank you for choosing the Courtyard Danville for your recent stay.

As requested, below is a billing summary or adjustment for your stay. **If you have questions about your bill**, please contact the hotel directly at (434) 791-2661.

Make another reservation on [Marriott.com](#) >>

COURTYARD[®]
Marriott

Marriott Rewards members may receive this email automatically after every stay.

[Modify your email preferences >>](#)

Summary of Your Stay

Hotel: Courtyard Danville
2136 Riverside Drive
Danville, Virginia 24540
USA
(434) 791-2661

Guest: DENNIS WALLER
WALLER & ASSOC.
15850 W BLUEMOUND RD STE
308
BROOKFIELD, WI 53005-6008
USA

Dates of stay: Apr 17, 2017 - Apr 21, 2017
Guest number: 98011
Marriott Rewards number: XXXXX4118

Room number: 303
Group number:

Date	Description	Reference	Charges	Credits
04/17/17	ROOM CHARGE	RB303	159.00	
04/17/17	Room Tax	RT303	17.97	
04/18/17	Restaurant Room Charge	FD1901	12.68	
04/18/17	ROOM CHARGE	RB303	159.00	
04/18/17	Room Tax	RT303	17.97	
04/19/17	Restaurant Room Charge	FD1986	13.24	
04/19/17	ROOM CHARGE	RB303	159.00	
04/19/17	Room Tax	RT303	17.97	
04/20/17	Restaurant Room Charge	FD2056	13.24	
04/20/17	ROOM CHARGE	RB303	159.00	
04/20/17	Room Tax	RT303	17.97	

04/21/17

Payment - MasterCard
XXXXXXXXXXXX0087

MC06:09AM

747.04

Total balance

0.00 USD

Was that the best night's sleep you've ever had? How about a repeat performance at your place!

shopcourtyard.com

Important Information

Do Not Reply to this Email

This email is an auto-generated message. Replies to automated messages are not monitored. If you have any questions please contact the hotel directly at (434) 791-2661.

Why Have I Received this Email?

You have received this email because you requested during your stay to receive an electronic version of your bill by email.

Availability

Electronic versions of your hotel bill, available by email from our over 2,300 participating properties in the Marriott family of hotels in the USA and Canada, are emailed to you within 72 hours of check-out. These email messages reflect changes made to your bill up to 11pm on your day of departure. Any adjustments after that time may not be shown.

If you have received this email in error, please notify us.

Learn more about eFolio, receiving your hotel bills by email.

Authenticity of Bills

Marriott retains official records of all charges and credits to your account and will honor only those records.

Privacy

Your privacy is important to Marriott. For full details of our privacy policy, please visit our Privacy Statement.

Credit of Marriott Rewards Points

After a stay, it may take up to 7 days for Marriott Rewards points to be credited to your account.

Terms of Use::Privacy Statement(c)1996-2012 Marriott International, Inc. All rights reserved. Marriott proprietary information.
Operated by Daly Seven (The) under license from Marriott International, Inc. or one of its affiliates.



Rental Agreement # 226444691

Invoice # 20021373437

Renter Information**Renter Name**

DENNIS K WALLER

Renter Address3360 LILLY RD
BROOKFIELD, WI 53005
USA**Contract**

EMERALD CLUB MEMBERS

Rental Credits

1 credit has been awarded for this rental

Vehicle Information**MAZDA 3 TOURING**

License #: Q749906

State/Province: IL

Vehicle Class Driven

Intermediate 2 or 4-Door/Automatic/Air

Vehicle Class Charged

Intermediate 2 or 4-Door/Automatic/Air

Odometer Mileage/Kilometers

Starting: 14,484 Ending: 14,804

Total: 320

Trip Information**Pickup**

Mon, Apr 17 2017 2:13 P.M.

RALEIGH DURHAM ARPT (RDU) ✈

1001 RENTAL CAR DR
MORRISVILLE, NC 27623
USA**Return**

Fri, Apr 21 2017 8:06 A.M.

RALEIGH DURHAM ARPT (RDU) ✈

1001 RENTAL CAR DR
MORRISVILLE, NC 27623
USA**Rental Charges**

Rental Rate	Time & Distance 4 Day at \$71.00 / Day	\$284.00
Mileage	Unlimited Mileage	Included
Taxes and Fees	Nc Highway Use Tax (8.00%)	\$27.04
	Transit Authority Tax (5.00%)	\$16.90
	County Gross Receipt Tax (1.50%)	\$5.07
	Customer Facility Charge 5.00/day (\$5.00 / Day)	\$20.00
	Vlf Rec .55/day (\$0.55 / Day)	\$2.20
	Conc Rec 11.11 Pct (11.11%)	\$31.80
Total		\$387.01
(Subject to audit)		
Amount charged on Apr 21 2017 to MASTERCARD (0087)		(\$387.01)
Amount Due		\$0.00

Thank you for renting with
National Car Rental

We appreciate your business!

This email was automatically generated
from an unattended mailbox, so please do
not reply to this e-mail.

If you have any questions about your
rental, please view our Frequently Asked
Questions or send us a secured message
by visiting our [Support Center](#)

Milwaukee Fast Park
5201 S. Howell Ave.
Milwaukee, 53207

MPS 04/21/17 13:40
Cashier 7
Receipt 044361

Short-Term Parking
Relax for Rewards
FPP\01208986

Milwaukee Fast Park

04/17/17 05:26

04/21/17 13:40

Period 4d8h15'

(VAT) \$42.50

Sub Total \$42.50

VAT \$0.00

Total \$42.50

Payment Received
MC \$42.50

XXXXXXXXXXXX0087

Merch:215051412991

Auth:030597

Type: Swiped

Includes 6% airport
tax imposed 1/1/17